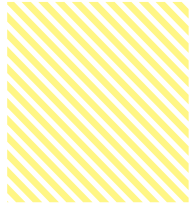


The main title is surrounded by several decorative elements: a small red triangle pointing up and to the right above the word "Our"; a vertical bar with diagonal hatching on the left side; a thick yellow diagonal bar crossing through the word "right"; and a horizontal bar with diagonal hatching on the right side.

Our guide to
**doing the
right thing**



Our vision for the Carey Group is to be the most socially responsible construction company that people are proud to work with.

It is not a shy or unassuming vision and to help achieve it, we must champion and live our values of care, passion, humility and authenticity every day.

To further support the decisions we make in pursuit of our vision and help us follow the key principles of ethical business conduct, this guide has been prepared to support you and be a reference tool whilst working with the Carey Group.

The culture we have at the Carey Group is one of the things I am most proud of and the standards we hold ourselves to are high. The contents of this document are common practice and will therefore not come as a surprise to our people. However, the majority of the rules set out in this guide are legal

obligations we need to meet as a company and so I would urge you to read this guide carefully and keep it in a safe place to refer to in the future.

A key part in delivering ethical standards is to ensure our people have the confidence and platform to speak up when they know something isn't right. I want to assure you that our leaders at the Carey Group, myself included, will always be available if you have concerns that something isn't right and this will never be held against you.

If you have any questions on the contents of this guide, please reach out to our People Team who will be happy to help.

Jason Carey
Group Chief Executive Officer



The culture we have at the Carey Group is one of the things I am most proud of and the standards we hold ourselves to are high.



Doing the right thing

Every day we make judgement calls and at work we must balance our values with regulations, rules and red lines, from health and safety to competition law.

The purpose of this booklet is to bring together the outline of some of these 'red lines' with our values to provide guidance to our people so that we can all be a part of a company with strong ethics and a genuine commitment to doing the right thing.

The content applies to everyone who works for or represents the Carey Group:

- Our directors, officers and employees
- Those we choose to work with and those who aspire to work with us

Carey Group employees that manage our supply chain or third parties such as suppliers, consultants, contractors and sub-contractors are also expected to understand and adhere to this guide and provide the appropriate information and training in order to do so. We take our values and rules very seriously and appropriate action should be taken if a third party is shown not to have complied. This may include termination of contract or project withdrawal.





Our values

To act with

care

humility

passion

and

authenticity

Our values have always been the DNA of the Group, but we have never clearly articulated them. With the help of colleagues from across the company, for each of our four values we have now also articulated the behaviours we do and don't want to see so that we know what we can expect from one another and can hold ourselves accountable against them.

is the Carey Way.

At Careys, we care. It's in our name and can be felt in the conversations we have, the decisions we make and the way we go to work.

care

what we do

- We check in with each other
- We listen to understand
- We have each other's backs

what we don't do

- We don't walk by
- We don't listen to respond
- We don't put ourselves before the team

We don't have all the answers and we ask for help to find them because we want to learn and become better. We're all human and we're continually growing.

humility

what we do

- We own our mistakes
- We are objective and always try to do the right thing
- We say thank you and well done

what we don't do

- We don't blame others
- We don't think our way is the only way
- We don't boast

We love the challenge of bringing ideas to life and we have fun doing it. Concrete and dry lining may not spark passion in everyone, but we make no apology for pursuing excellence in whatever we do.

passion

what we do

- We give it our all
- We are curious
- We are committed to our goals

what we don't do

- We don't say "that'll do"
- We don't shy away from a challenge
- We aren't put off by obstacles

Being authentic sets an example for others to be the same. We speak up and know that there's no such thing as a stupid question. The more questions we ask, the more open and collaborative we can be.

authenticity

what we do

- We're genuine
- We encourage others to have their say
- We share what we're thinking with respect, sincerity and care

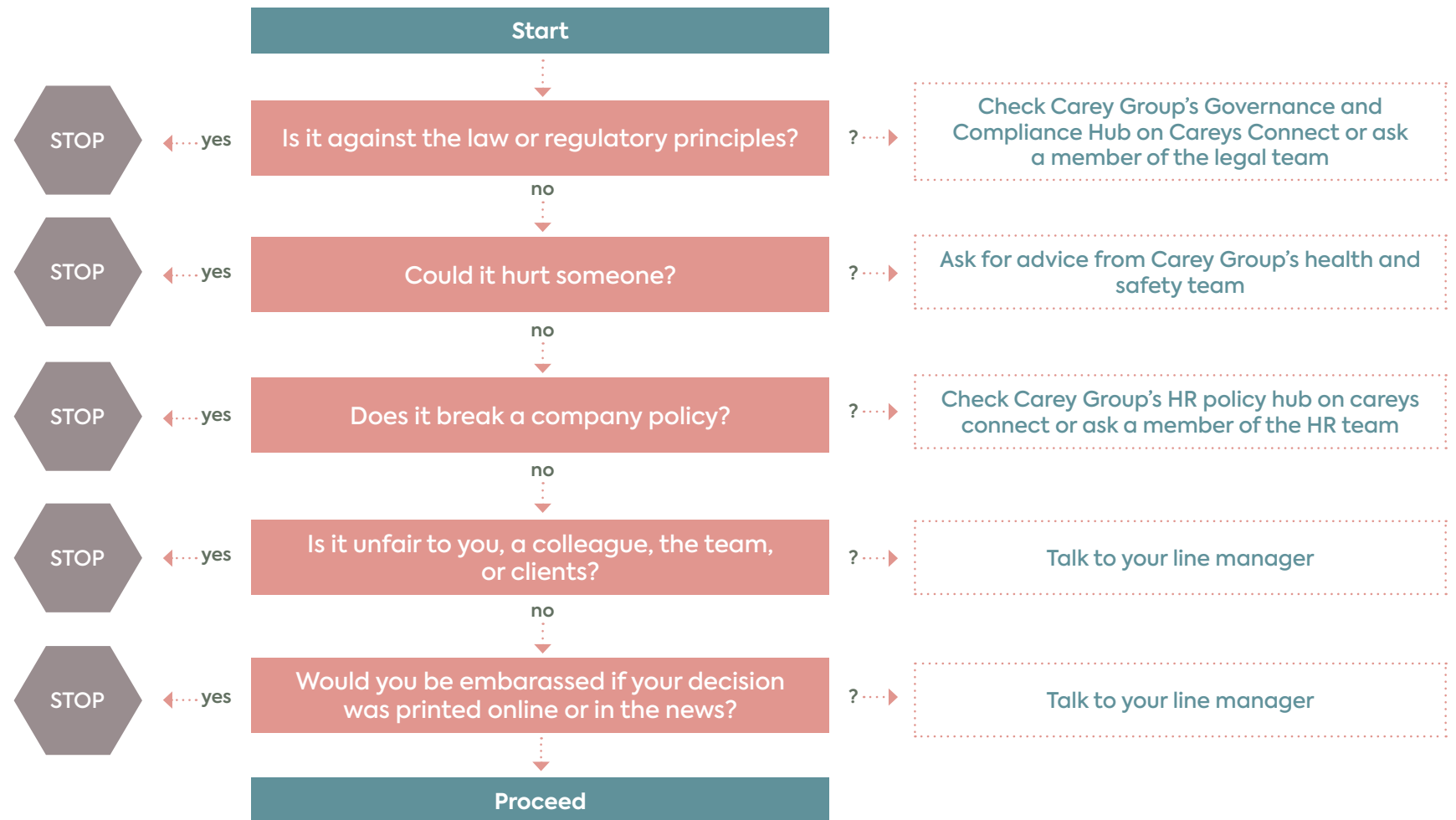
what we don't do

- We don't have hidden agendas
- We don't judge others
- We aren't rude

Practical steps to ethical decision making

A decision tree can be a useful tool when you are faced with a difficult decision.

By asking yourself some simple questions it can guide you towards doing the right thing.



Being a responsible company

We pride ourselves on being a responsible company that ensures we comply with the law and do our part to protect the environment. We strive to ensure we operate responsibly in the communities in which we work.

Sustainability

Our sustainability approach is the 'golden thread' throughout our organisation and is simply the way we do business. It guides us to ensure we foster a culture where everyone can make the right, responsible choice.

We also recognise the added value that we bring when making business decisions on a whole life cost basis and considering social, economic, and environmental advantages that are available.

Environment

We are committed to developing a resource-efficient future and we aim to operate a sustainable business that makes a positive contribution to the communities and environments we work within.

We manage our environmental impacts via our externally certified Environmental Management System and work in accordance with relevant legislation to ensure legal compliance.

We will take every opportunity to learn and improve our approach through the 'plan, do, check, act' philosophy. So, if things do go wrong, no matter how small we will stop, report the incident and work together to put it right.



We recognise the complexity of the global challenge of climate change and are committed to doing our bit to be part of the solution and not the problem as we look to transition to a less carbon intensive approach.

Respecting each other

We believe in treating everyone fairly. We respect and protect human rights and we recognise the value of having a diverse and inclusive workforce.



Diversity and Inclusion

We are committed to ensuring that all employees and job applicants are treated fairly and equally irrespective of sex, gender assignment, sexual orientation, religion or belief, marital or civil partnership status, age, race, colour, nationality, national origin, ethnic origin, disability, pregnancy or maternity/paternity. Everyone will also be treated equally regardless of their employment status or membership of a Trade Union.

We consistently aspire to develop a culture where our people feel valued and are inspired to contribute to their fullest potential

Every employee has a personal responsibility to:

Treat people fairly and without prejudice

Ensure that no one is harassed, victimised or bullied inside or outside of work

Promote a work environment where everyone feels confident to report incidents that are unfair or personally offensive

Seek to develop their own skills and encourage others

Living Wage

The Carey Group adheres to the National Living Wage as set down by the UK government and is reviewed annually in line with the government review of rates.

We review and bring in line the pay for our workers on specific projects to the 'Real Living Wage' (as outlined by the Living Wage Foundation).

We have aligned our pay to reflect the market conditions within the industry and pay competitively to attract and retain the best people. Over time, this may also include obtaining accreditation via the Living Wage Foundation.

Respecting each other

Human Rights

We are committed to protecting and promoting human rights throughout the UK and Ireland. The Carey Group does not tolerate child labour, forced labour (including prison labour), or any use of force or other forms of coercion, fraud, deception, abuse of power or other means to achieve control over another person for exploitation.

[Click here to read our Modern Slavery Statement.](#)

Harassment at Work

Harassment is unwanted conduct that has the purpose or effect of violating a person's dignity, or creating an offensive, intimidating or hostile environment. This can be physical, verbal, non-verbal or written and also covers unwanted sexual advances, including touching or standing too close to someone. Harassment can occur between employees but could also come from individuals outside of the workforce including clients or suppliers.

We do not tolerate racial, sexual or any other form of harassment that fails to create respect in the workplace. Everyone plays a part in ensuring our workplace is free from discrimination, bullying and harassment and it's essential that we promote an environment where you treat everyone as you would like to be treated yourself.

If you believe you are being bullied or harassed, you should speak to your line manager as soon as you can. If this is not appropriate, you can speak to a member of the HR Team in confidence. Support is also available through our Employee Assistance programme.



Our actions

The way we work every day matters – our actions define us and what we stand for. Our reputation has been built over the last 50 years by doing the right thing.

Conflicts of Interest

A conflict of interest is when competing interests may prevent us from making objective and unbiased decisions on behalf of the company. There are various examples of conflicts of interest including:

Owning part of a business that sells goods or services to the company

Offering paid services on your time off to a company, client or supplier

Recruiting a close friend or family member

It's essential that we're all continuously aware of any conflicts of interest as they arise. These types of situations can influence our decision making and could be damaging to our reputation.

Everyone has a responsibility to avoid conflicting their personal interests with the interests of the company. You should inform your line manager of any potential or actual conflicts as soon as you are aware of it.

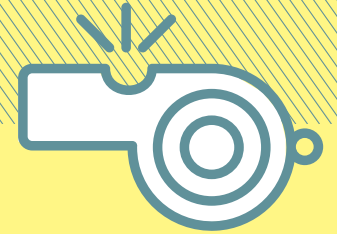
Anti-Bribery and Corruption

Bribery is an unhealthy and unfair activity which will not be accepted at the Carey Group.

A bribe is used to persuade someone to act in a certain way by offering them money or other incentives. It is against the law to:

- promise or give a bribe to someone
- receive or agree to accept a bribe

Accepting gifts or entertainment from clients, suppliers or any other person or organisation with which the company has business connections is not allowed, except in limited circumstances.



Whistleblowing How can I speak up?

At the Carey Group, one of our most important goals is for everyone to feel that they are part of a great place to work. A huge part of that means feeling safe, both physically and psychologically, and being a part of an inclusive and open culture.

Unfortunately, there may be situations where employees might be witness to or experience dishonest or unethical behaviour, corruption, health and safety breaches, harassment, bullying or other forms of wrongdoing.

Our Whistleblowing policy provides guidance on how you can raise concerns about an incident that happened in the past, is happening now, or you believe will happen in the near future. Genuine concerns should be raised without fear of reprisals, even if they turn out to be mistaken.

We have partnered with a third-party provider, Safecall, to offer an independent first point of contact for people who feel they cannot raise their concerns with their line manager. All calls are treated with confidence by independent advisors and we welcome reports even if you decide that you wish to remain anonymous.

Our actions



Responsible Tax

We recognise the importance of being a good corporate citizen and apply this same approach in our tax strategy. We strive to be compliant and transparent in our tax affairs by meeting all our tax obligations and responsibilities.

We align the management of our UK taxation affairs with our company strategy, striving to ensure we comply with both the letter and the spirit of relevant tax laws.

The overriding requirement of our tax strategy and policy is to comply fully with tax law, both in the UK and Ireland. We aim to make timely and accurate tax returns and payments. We aim to be fair to our stakeholders, including clients and shareholders and make use of approved incentives, tax reliefs and exemptions to optimise our tax commitments but do not set up structures or transactions aimed solely at securing a tax advantage.

Where any tax planning is undertaken, it will be on the basis of full disclosure to tax authorities. We have a very low tolerance of tax risk and our strategic decisions are driven by commercial rather than tax objectives.

Responsible Procurement

We work hard to ensure we select and use materials in an ethical and responsible manner. This applies to materials we procure directly and through our supply chain and subcontractors.

This means that all products and services supplied are produced under a set of internationally acceptable environmental, social and ethical guidelines and standards. We use tools like SEDEX to communicate minimum standards as well as validate those of our supply chain.

To ensure all those in our supply chain and contractors comply with our values, we expect our suppliers to have a natural respect for our ethical standards in the context of their own culture. We specifically expect our suppliers to extend the same principle of fair and honest dealings to all others with whom they do business, including employees, sub-contractors and other third parties.

Fair Trading

Trading unfairly is illegal as well as being unethical practice. We are committed to ensuring we trade fairly and are fully aware of our responsibilities. If there is suspected misconduct, it's essential that this is reported immediately.

Competition

The success of any economy is built on fair trade and free competition. There are competition laws set out in the UK and Ireland which are there to protect companies and consumers from unfair or anti-competitive practices. Any agreements, business practices or conduct that has an adverse effect on competition is against the law. Regulatory authorities can conduct investigations into any anti-competitive activities which could result in a sanction including significant financial penalties.

We have a responsibility to ensure all of our business dealings are conducted in line with competition law. We have an unambiguous policy of competition law compliance and we provide training for all employees who require this information when carrying out their role.

We do not tolerate collusion between competitors or any other form of anti-competitive conduct.

Looking after each other

We have each other's backs and look after each other in all situations.



Health and Safety

The health, safety and welfare of our people, subcontractors, clients and the public is our priority, from the planning stage of a project through to its delivery. Our HSSQ Policy Statement of Intent demonstrates our commitment to continuous improvement in health, safety, sustainability, environment and quality.



Our in-house health and safety programme Safe Home Every Day (SHED) is an ever-evolving behavioural change

programme designed to connect with our people and demonstrate the importance of minimising risk and remaining vigilant. Minimising risk is at the very centre of the SHED programme. We teach our teams that there is nothing so important that we cannot take the time to do it safely. Careful consideration of the method and impact of executing every activity performed on site must always be taken to ensure safety is prioritised over the pressure of getting things done as quickly as possible.

We are proud to have two initiatives that have a highly positive impact on our health and safety culture:

Site observations – A hugely important part of our day and it ensures our site teams take the time and space to walk the site, talk to the teams, receive feedback and suggestions, and concentrate on areas highlighted for improvement.

Careys visual standards – As a company, we are committed to upholding the very highest standards of health, safety and quality on every site.

Our visual standards provide pictorial guidance and concise detail of what needs to be considered across a wide range of operational activities so that all of our work is delivered in the Carey Way. They are supplemented by a written list of “Dos” “Don’ts” and “Considerations”. The clear, simply written text and use of images ensures that instructions are easily understood by the widest possible range of people – including those for whom English is not a first language.

Drugs and Alcohol

The safety of our people is paramount. We are committed to having a workplace free from alcohol and illegal drugs that may affect an employee’s ability to safely perform all aspects of their job. No employee, subcontractor or agency worker will be allowed to work if they are under the influence of alcohol or illegal drugs and may harm themselves or others around them. Workers can also be required to take random drugs and alcohol tests. We will always offer support to any employee who feels they are suffering from a drug or alcohol dependency problem.

Making a positive impact in the world

We want the Carey Group to be the most socially responsible construction company, ensuring the impact of our operations is a positive one for the short, medium and long term.

Corporate Responsibility

Responsible companies deliver on more than just legal obligations. They care not only about what they deliver but also how and why.

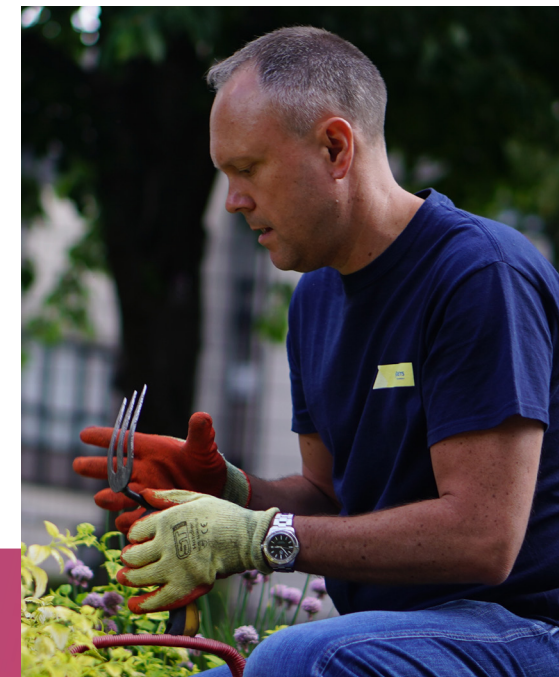
Social Value

We believe in honouring, respecting and supporting the communities we work with. At all times, throughout each and every one of our projects, we look to engage positively with the community.



Careys Foundation

Careys Foundation was established in 2012 and became a registered charity in 2015. Through the activities of the Foundation, we can leave a positive legacy on the communities we work within. We take considerable pride in the Foundation's commitment and approach to helping others, which is firmly grounded in the strong Carey family values which have underpinned the wider Group since 1969.



Our security

Protecting each other and our assets both physically and digitally is important.



Cyber Security and Data Protection

We handle a wide range of confidential and personal data therefore it is essential that we operate a robust IT infrastructure to ensure the security of information. Everyone must ensure that processes are followed to protect personal data and ensure they contact their line manager if any data is misused. It is important that we keep data secure at the same time as meeting the standards set in the Data Protection Acts in the UK and Ireland. That includes processing data fairly, making sure data is accurate and never keeping data for longer than necessary.

It is a priority for us to protect data and ensure it cannot be abused or copied outside of the Carey Group environment when it's stored, to this end we ensure all mobile devices are encrypted to secure data.

Security

Everyone at the Carey Group is responsible for the security of the company's assets, systems and information.

We are all expected to do the following:

- Keep vigilant for any potential security risks
- Challenge any suspicious circumstances which could cause a breach
- Protect individual identities
- Report incidents within 30 minutes

How we communicate

When we communicate in a digital form, the footprint we leave is permanent.



Social Media

Social media, such as LinkedIn, is increasingly used to communicate, discuss and share information, and it is our Marketing team's job to manage and use them on behalf of the company.

It is important no-one else does so unless they've been trained and have the right approval. If you are considering using social media in a business capacity, you should seek advice and approval from the Marketing team first.

The lines between our personal lives and work lives can easily become blurred when using social media. When using social media in a personal capacity, always ensure that it is clear that your comments are your own and not those of the company.

Employees may wish to include a disclaimer in social media profiles, along the lines of: 'The views expressed are my own and do not reflect the views of my employer.'

You should not use any Carey Group branding as part of your profile on any social media channel.

Media

Effective media relations are essential to the success of any company that operates in the public eye. We want to ensure that the information we disclose is timely, accurate, comprehensive and relevant.

Our Marketing team is the designated point of contact for all media enquiries and the team act as our company spokesperson or will designate and work with a nominated spokesperson.

If you receive any enquiries from the media, ensure full contact details are taken and pass these to a member of the Marketing team immediately – never be drawn into answering questions or providing comment.

This media policy applies to all employees of the company and covers all external media including broadcast, digital and print.

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