

CODE OF CONDUCT

A Message from the Director

The global standing for acting safely and responsibly is critical to running a successful and growing business that generates value for all our stakeholders. This reputation stems from our core Vision and Values, which define who we are and underpin everything we do.

These values are expressed through the guiding principles and standards of conduct set out in our Global Code of Conduct. They define the way we manage the economic, social and environmental challenges of our operations and are important in fulfilling our commitment to contribute to the safe and sustainable development of the built environment.

People will judge us by our actions and not simply the good intentions of our words. The behavior of each and every one of us will influence how well we perform and how the world views EAISL. The new Global Code of Conduct will guide our behavior in this regard to create a success that we can all be proud to share – and one that further enhances our reputation.

By working according to our values and complying with the standards set out in the Code we will sustain long term business success by encouraging more ethical and effective relationships and stimulating deeper contributions in the communities where we operate.

Please take the time to read and understand the Code and use it as a continual reference in your work.

Ketan Patel

Director

What this Code is for:

The Global Code of Conduct sets standards of behavior which we should expect from one another, and which other people should expect from us. It explains what sort of conduct is acceptable in different situations, what we must avoid doing, and what to do if you have a concern.

What's in it

The Code is made up of a set of principles that set standards for our business conduct in different areas of our work. Underneath each principle, we explain how it should guide your actions and decisions, giving examples of situations that might be cause for concern.

How the Code guides the way we do business

The Global Code of Conduct is integral to the way we do business at EAISL and underpins our Group Vision and Values. It sets clear expectations for everyone in the company to ensure we conduct our business affairs with the utmost integrity.

We aim to enhance our reputation within the construction and engineering industry as an organization that seeks to uphold the highest standards of ethical business conduct. We believe laws and regulations act as our minimum integrity standards, and we constantly seek to go beyond this level. The Code articulates the general principles of conduct that we expect every EAISL employee to uphold in every activity, every day, wherever we operate.

The EAISL Group's activities are informed by our unique character described in our Vision and Values. These are underpinned by our Code of Conduct, Group Policies and The EAISL Way. Together they form a compelling and relevant guide to what we want to achieve and importantly, how we will achieve them.

Our Vision is to be the company of first choice for all stakeholders. We will challenge and change the poor image of construction worldwide. With leanness and agility we will adopt processes to compete with world-leading businesses.

Our guiding Values underpin everything we do:

- Make safety personal
- Lead by example
- Work as one team, listen to everyone
- Find or follow a better way
- Deliver on our promise, aim to exceed
- Collaborate with clients and partners

The Code of Conduct is our approved set of ethical principles covering key business issues. It guides every employee in upholding our commitment to act fairly and responsibly with all stakeholders. All EAISL employees must comply with the Code in both spirit and letter.

Who this Code is for

All employees, directors and temporary staff

Everyone directly employed by EAISL must follow the Code.

Contractors and consultants

We require anyone acting as our agent or working on our behalf to follow the Code.

Third parties

We expect any third parties we deal with, such as partners, affiliates, sub-contractors and suppliers, to follow and uphold the standards set out in the Code.

Responsibilities for employees

Understand the Code and keep it front of mind

- Read the Code carefully and keep it close at hand
- Ask for help and advice if anything isn't clear
- Keep the principles of the Code in mind in your day-to-day work
- Sign the personal commitment pledge
- Take part in training around the Code
- Record any gifts, received or offered, on the gifts register

Raise your concerns

- Raise any concerns you might have, and report any suspected breaches of the Code

Special responsibilities for managers and supervisors

Promote the Code

- Promote the Code's principles by setting a personal example
- Make sure the Code is understood by employees, giving guidance when necessary
- Ensure everyone in your team signs up to the Code
- Raise awareness and understanding of the Code through training
- Raise awareness of the Code among third parties (such as contractors and suppliers)

Ensure compliance

- Monitor compliance with the Code by your team
- Ensure that third parties comply with the Code

Speaking up

If you have a concern or you think that a breach of the Code might be taking place, it's important to speak up about it. Speaking up early could protect you from serious legal consequences; avoid damage to the company's reputation and even save someone's life.

Reporting a breach

If you are aware of a breach of the Code, or if you are suspicious that a breach is taking place, you must report it.

There are a number of different ways you can raise a concern or get help. Choose whichever route you feel comfortable with, or suits the situation best.

With a Project leader or supervisor

If you don't feel comfortable talking directly about an issue, you could raise it with a project leader or supervisor.

Through HR or legal departments

If you would prefer not to raise the issue with your manager, you could email or write a letter to the Human Resources.

The Conduct Line

Our dedicated phone line for reporting breaches of the Code is independently run, completely confidential and available 24/7.

The Conduct Line website

You can also register any concerns online at info@eaisl.com

What happens when you report a breach?

When you make a report, this will be passed to the Human Resource for investigation.

The Human Resource department will co-ordinate to:

- a) Validate the information and decide a suitable course of investigation
- b) Brief the director
- c) Identify any specialist support required
- d) Manage communications, as necessary
- e) Collect, check the integrity of, and preserve all relevant information

Depending on the circumstances, the results of an investigation may include disciplinary action up to and including dismissal. Ultimately, findings will be reported to the Director.

If a crime is found to have been committed, the investigation team will contact the police who will initiate legal proceedings.

How we support you

We will treat your report confidentially and communicate it on a need-to-know basis only. You can raise reports anonymously if you prefer to, and the laws of your country allow you to do so. Making a report will not adversely affect your career or your relationship with your colleagues. We will never penalize you for making a report in good faith, even if your suspicions prove to be unfounded. We will not tolerate any retaliation or discrimination of any kind against anyone who does the right thing. If you or anyone else you know is experiencing retaliation or discrimination, don't put up with it – report it at once. We regard any such behavior as a serious matter, and we will act against it and protect you.

Fraud, deception and dishonesty

Our guiding principle

We will never knowingly engage in, condone or ignore any kind of fraud, false claim, deception or dishonest behavior or allow someone else to do so on our behalf.

What it means:

Fraud is any attempt to deliberately deceive someone, by acting dishonestly or abusing a position to gain a material advantage. The 'advantage' is often money but could also be property, a service or preferential treatment.

Making a **false claim** is fraud; using or diverting the company's money or resources for improper purposes is also fraud.

Money laundering – concealing illicit funds or making these funds look legitimate – is closely linked to fraud as well as bribery and corruption.

We always:

- act fairly and transparently
- assess the integrity of potential customers and partners
- ensure our company information is complete, not misleading and complies with our contractual obligations
- ensure our invoices reflect the true situation
- accurately record time spent, expenses, materials and services provided

We never:

- falsify expenses or claim for expenses not incurred on legitimate company business
- knowingly misrepresent or inaccurately record time spent or materials or services provided
- allow anyone else to act fraudulently on our behalf
- ignore anything that we suspect could involve or give the appearance of fraud or deception
- make payments in cash or cash equivalents, or in currencies other than those specified on the invoice

Conflicts of interest

Our guiding principle

We seek to avoid situations in which our personal circumstances could lead to a conflict of interest. We declare and resolve any potential conflicts as soon as we become aware of them.

What it means:

A conflict of interest arises when two or more interests compete, potentially compromising someone's judgment, loyalty or independence.

We respect individual privacy and believe that outside interests benefit employees; however, if your personal, social, political or private business activities conflict with your loyalty and obligations to the company this 'conflict of interest' must be resolved.

Even the hint or appearance of a conflict of interest can be just as damaging as an actual conflict of interest.

We always:

- report any conflicts of interest or perceived conflicts of interest as soon as one become aware of them
- inform EAISL if a close relative holds a position of influence within a company
- abstain from any decision-making process where our motives, loyalty or independence could be questioned
- seek approval before accepting any outside employment, advisory position or directorship

We never:

- use our position, contacts or any knowledge gained within EAISL for personal gain, or to benefit family or friends
- act in a way that may create the impression that customers or suppliers have a contact within EAISL who can exert influence on their behalf
- pay a third party more than a contractually agreed, market-based fee for goods or services
- invest in supplier, customer or competing companies if the investment might influence decisions we make on behalf of the company

Gifts and hospitality

Our guiding principle

We make sure all gifts and hospitality are within acceptable limits and will never offer or accept anything that could be perceived as a bribe or an attempt to inappropriately influence a business decision.

What it means:

The exchange of gifts and hospitality is customary in some cultures and can build goodwill in business relationships, but can be used improperly. It is not just the value that's important; the intent and timing too must be considered. Excessive or inappropriate gifts or hospitality can tarnish our reputation for fair dealing and may even break the law.

All gifts and hospitality must be registered on our Gifts, Hospitality and Conflicts of Interest Register

We always:

- comply with the limits in our policy and record gifts and hospitality given and received in our company register
- exercise care when offering any gift or hospitality to a public official and check the specific rules in advance
- make sure any gifts or hospitality we offer or receive are legal, customary and reasonable in terms of value and frequency

We never:

- offer or accept gifts or hospitality if we think they might impair objective judgment, improperly influence a decision or create a sense of obligation, or if there's a risk they could be misconstrued or misinterpreted by others
- accept any gift or hospitality which is offered for something in return ('quid pro quo')
- accept any gifts of cash or cash equivalents (vouchers, investment securities, cheques and so on)
- offer or accept any hospitality of an inappropriate nature or which does not comply with our commitment to respecting the individual or which might damage our reputation

Working with third parties

Our guiding principle

We will conduct due diligence on all prospective agents, intermediaries and joint venture partners and only work with third parties whose policies and standards are in accordance with our own.

What it means:

The breadth of our expertise and geographical reach means we are engaged on a wide range of projects, working around the country and from time to time we may hire a third party to help or represent us. Their local knowledge and experience can be essential but it is our responsibility to make sure their conduct meets our standards. If they act illegally on our behalf we may be liable to prosecution.

We always:

- obtain senior management approval when retaining the services of an agent or other third party representative and follow the approved process to hire them
- conduct due diligence to check an agent's integrity, experience, background and reputation
- make sure we understand what services a third party will actually deliver in return for the money we pay them
- ensure that all the money can be properly accounted for and payments are transparent and recorded
- report any offers of gifts, lavish hospitality or other illegal attempts to win an unfair business advantage by any third parties on our behalf

We never:

- permit any third parties to offer, pay bribes or make facilitation payments on our behalf, or do anything else we would not be permitted to do ourselves
- enter into an agreement that does not have a clear and proper commercial rationale
- pay any money to an agent unless a binding written agreement is in place and we know exactly what the payment is for

Relationships with suppliers

Our guiding principle

We are committed to developing mutually beneficial relationships with suppliers who share our values and adhere to our Global Code of Conduct.

What it means:

Suppliers play a key role in enabling EAISL to deliver its core business. We believe in working openly, fairly and ethically to build lasting relationships and deliver the highest value for our clients.

We always:

- select suppliers and partners based on fair, transparent and objective processes
- work with suppliers who share our business and ethical standards in accordance with the Code of Conduct
- ensure total compliance with the applicable laws and regulations of the country in which we are operating, including working hours, wages, welfare, human rights and International Labour Organization Core Conventions
- encourage suppliers to provide robust training programs and support for employees' career development
- ensure work is completed to the agreed timelines, quality, cost targets and with the highest standards of professionalism
- work openly and collaboratively with our supply chain, resolving disputes in a non- adversarial manner

We never:

- tolerate any form of bribery or corruption
- turn a blind eye to any practices of human rights infringements on supplier employees

Relationships with customers

Our guiding principle

We treat our customers with the same respect and professionalism we expect from each other and strive to build strong and lasting relationships that add value.

What it means:

Our customers are critical to the success of our business and living up to our values and the principles of fairness, transparency and professionalism will enhance our relationships and our reputation with them. We believe our customers should be able to expect the same standards from us as we expect from our colleagues and others.

We always:

- seek to add additional value for our customers wherever possible and always deliver our promises
- only work with customers who share our business and ethical standards in accordance with the Code of Conduct
- act fairly, transparently and ethically when appointing suppliers and partners on behalf of our customers
- meet our contractual obligations and work together to resolve any disputes early on
- communicate honestly and transparently at all times
- seek to develop strong and lasting relationships

We never:

- forget that satisfying our customers is critical to the success of our business
- fail to keep our own contractual agreements

Health and safety

Our guiding principle

We will not compromise the safety of anyone involved in or affected by our operations; health and safety is central to the success of our business.

What it means:

At EAISL we know that a responsible business is a sustainable business. We take our responsibilities seriously – and none more so than health and safety. No other matter – commercial or operational – takes precedence over the health and safety of those involved in or affected by our activities.

We have set ourselves the target of eliminating all accidents from our business by 2020. This is an ambitious goal; one that we are confident we will achieve through the personal commitment of our employees, suppliers and subcontractors to create a positive culture that puts safety first, always.

This highly successful behavioural safety approach is backed by a pipeline of investment at every level – from the product and process innovations that remove risks from our activities to the medical interventions that support the wellbeing of our workforce.

We always:

- protect the health and safety of everyone involved in or affected by our operations, eliminating all accidents by 2020
- follow the rules and procedures
- recognize personal responsibility for our own safety and that of others
- speak out against unsafe behaviours or conditions
- lead by example, demonstrating a positive commitment to safety and inspiring others to do the same

Drugs and alcohol

Our guiding principle

We are committed to a future free from incident and injury, and the effective management of drug and alcohol misuse is an integral part of this.

What it means:

EAISL has a zero tolerance policy on the use of alcohol and drugs whilst on duty or on EAISL premises, anywhere in the country. This extends to employees, consultants, trade contractors or anyone engaged as a 'worker'. Breaches of this policy will result in disciplinary action and/or dismissal and may include criminal proceedings.

We have set control measures in place to prevent, as far as reasonably practical, individuals from working or entering work premises while under the influence of drugs or excess alcohol, or consuming these at work.

We always:

- take a positive approach to any employee/worker seeking help or guidance in overcoming alcohol and/or drug-related problems – provided this is raised prior to any random or planned testing
- advise pharmacists/medical practitioners of the EAISL Drugs and Alcohol Policy when being prescribed medication and on the advice of the medical practitioner, notify management about any possible impact on health and safety at work
- present ourselves fit for work and never in a condition which could compromise anyone's safety
- take suitable action – up to and including dismissal or termination of contract – against anyone testing positive for alcohol or drugs in breach of this policy

We never:

- knowingly employ or retain any employee/worker, directly or indirectly, who has been justifiably dismissed by an employer for alcohol and/or drug-related misconduct
- consume alcohol while undertaking daily work duties at any time on company premises
- ignore signs of a colleague/supplier appearing under the influence while undertaking daily work duties. This can seriously compromise the safety and lives of others and must be reported

Equal opportunities

Our guiding principle

EAISL is committed to being an equal opportunities employer: an employer that maintains the highest standard of employment practice and one which aims to employ a workforce that reflects the diverse society in which we live and work.

What it means:

Providing equal opportunities ensures everyone gets the same high standard of treatment from their employers. We value the varied talents and perspectives of our workforce, understanding the need to reflect the diversity of clients and communities we serve.

We always:

- seek to create a supportive environment where everyone can reach their full potential
- recruit, select, promote and train on the basis of skills and merit
- strive to identify and remove barriers that hinder the achievement of a diverse and talented workforce
- ensure those involved in recruitment, selection, training, grievance or discipline decisions are familiar with our Code and the policies that support it
- ensure appropriate opportunities for learning and development are made available to all employees
- ensure all employees are aware of our Code and policies and the role and responsibilities they have for upholding them

We never:

- encourage or accept any form of unlawful discrimination

Harassment and bullying

Our guiding principle

We treat all colleagues with respect and dignity and do not tolerate any form of harassment or bullying.

What it means:

Harassment and bullying are regarded as behaviours that reduce the quality of life of another person or disrupt their work by means of single or successive acts of verbal or physical abuse, ill-treatment or otherwise creating a hostile or offensive work environment. They can be based on another's age, disability, gender, gender reassignment, marital status, race, colour, nationality, ethnicity, religion, sexual orientation, medical condition or background.

We always:

- endeavour to protect workers from all forms of harassment helping them take action against it without fear of reprisal
- encourage employees who feel they are being harassed or bullied to speak up
- take complaints of harassment and bullying seriously, investigate immediately and take appropriate action

We never:

- accept any kind of behaviour that could be interpreted as harassment or bullying
- tolerate false or malicious complaints
- attempt to justify or excuse harassment or bullying as humor
- threaten a colleague, supplier or third party with physical or verbal violence

Human rights

Our guiding principle

We are committed to upholding the human rights of all those who work with us and for us and comply with international conventions regarding human rights and enforced or child labour.

What it means:

Basic human rights, as defined by the United Nations Universal Declaration of Human Rights, include the right to life, liberty and security; equal rights of men and women; the right to protection under the law from discrimination, slavery, torture, or inhumane or degrading treatment; and freedom of speech, thought, conscience and religion.

We always:

- uphold the principles defined by the United Nations Universal Declaration of Human Rights
- follow the labour laws of the countries in which we operate
- comply with minimum wage and minimum age requirements
- adhere to regulations regarding maximum working hours
- listen when concerns are raised, and whenever possible take action to address them
- encourage employees to become involved in improving team performance

We never:

- exploit anyone
- allow anyone to be exploited in our name
- do business with any individual, or organization that does not support basic human rights or adhere to our own Code of Conduct/standards for our employees.

The environment and responsible sourcing

Our guiding principle

Everything we do has an impact on the environment; we will work to stringent standards to make a positive contribution to environmental protection whilst raising standards for the industry as a whole.

What it means:

We care about our world and look to improve it through the things we do. We are committed to the practical principles of sustainability and seek to balance social, environmental and economic considerations in building a better quality of life for all stakeholders.

We always:

- respect, protect and enhance the environment and the communities we work within
- comply with environmental legislation and other requirements
- use our supply chain management system, supplier code and materials procurement protocol to guide our sourcing decisions
- prioritise use of materials and services with the lowest environmental impact with consideration of non-hazardous, renewable, recyclable and reusable materials
- source materials locally where possible
- regard environmentally sustainable performance as a priority
- minimize our environmental impact through prudent and efficient use of resources in all our operations and in the products and services we provide
- look to reduce our use of energy consumption on our sites and when we travel
- look to reduce water consumption, improve water efficiency and reduce waste and polluting emissions
- make sure we act to protect wildlife and conserve their natural habitats

We never:

- breach environmental protection laws or regulations
- act complacently towards the environment and the communities we affect
- ignore the impacts of our activities and projects on the environment throughout their lifecycle

Protecting personal information

Our guiding principle

We respect an individual's right to privacy and will treat all personal information as confidential. We always comply with data protection and privacy laws.

What it means:

Data protection and privacy laws vary from country to country. Wherever we are trusted with personal information we will abide by a country's laws and our own standards where these are higher. Individuals trust us with their data: if we fail to look after their data, we risk destroying that trust.

We always:

- respect and safeguard personal and sensitive personal data
- collect only the data we need, informing individuals why we need it and using it for that purpose
- only disclose information in accordance with legislation
- dispose of personal data securely
- report losses of data or breaches of confidentiality promptly

We never:

- seek personal data without permission
- share personal data on yourself or a colleague inappropriately
- keep personal data for longer than we need it
- transfer personal data to other countries without first checking with the legal department or a data protection advisor

Safeguarding confidential information

Our guiding principle

We keep confidential information safe and protect it from unauthorized disclosure.

What it means:

Confidential information is any information classed as confidential developed by or entrusted to the company and its employees. Such information could include financial information, business or marketing strategies, tender documents, pricing policies and customer, supplier or employee information.

We apply the same standards of confidentiality to information entrusted to us as we do to our own.

We always:

- adhere to our information security policies when storing or exchanging confidential information
- report any confidential information disclosed to us
- ask for advice if we think information may have been compromised
- return any confidential information we come across to its rightful owner
- make sure our partners, suppliers and customers protect our confidential information

We never:

- elicit or seek to discover confidential information from another
- leave confidential information unsecured or unattended
- discuss confidential information in a public place where it can be overheard

Use of IT and communication systems |

Our guiding principle

We use our IT and communications systems appropriately, ethically and responsibly.

What it means:

Our IT systems and personal computers, mobile devices or smart phones are valuable company assets. We allow limited personal use of them, as a privilege, providing the items and data they contain is kept secure and any personal use is legal and appropriate.

We always:

- follow our information, security and acceptable use policies
- take steps to protect our systems and assets against loss, damage or theft
- report any loss or security breaches promptly

We never:

- abuse the privileges granted to us
- use the company systems for any inappropriate or illegal purpose. This includes accessing, downloading or disseminating material which is offensive, sexually explicit, defamatory, discriminatory, racially or otherwise abusive, harassing or violent
- store information that has been gained illegally on our systems
- use company systems to view or distribute content that might cause offence or anxiety to colleagues

Financial controls and records keeping

Our guiding principle

We ensure we have suitable financial controls in place and that our records and reporting processes are complete, accurate and transparent.

What it means:

Regardless of whether the information is for internal or external scrutiny, ensuring the integrity and transparency of our financial controls and records is essential to us. It safeguards our credibility and reputation and protects us, our customers and partners.

We always:

- record all information accurately and honestly and according to the law
- ensure any figures we record are accurate and can be substantiated
- present accounts and records as required by the laws of the country we work in
- comply with any applicable document retention and disposal policy
- co-operate fully with internal and external auditors

We never:

- knowingly make a false or misleading entry in a report, record or expense claim
- fail to record any transaction or expenditure or record it in an ambiguous or misleading way
- establish or maintain any undisclosed or unrecorded accounts, funds or assets
- sell, transfer or dispose of company assets without proper documentation and authorization
- record things in the wrong place or way, even if the customer requests it
- destroy or alter any information or data that must be kept for an investigation or for legal reasons

Protecting company assets

Our guiding principle

We value all our assets and resources – tangible and non-tangible – and will protect them from improper use.

What it means:

Our assets include both physical assets, such as property, materials, personal equipment and company funds, as well as non-tangibles, such as reputation, intellectual property, business plans and marketing strategies. We also consider employee time and talents as assets which should not be misused.

We always:

- take great care when spending money on the company's behalf
- treat company property with respect and use assets and resources appropriately
- avoid excessive waste and look for more efficient ways of allocating resources
- manage intellectual property, including rights, patents and know-how, effectively
- follow all applicable policies and procedures
- challenge and report anything we believe compromises security

We never:

- condone theft, misuse or misappropriation of company assets or property
- use the company's property for personal use beyond the limit allowed in our policies
- misrepresent or abuse expenses or claim for sums not spent on legitimate company business
- knowingly infringe third party Intellectual Property rights
- assume security is someone else's responsibility