

Code of Ethics



This document supersedes all other existing ethics policy variations or drafts done to date. The “Company” refers to UMS UK (Ltd) and all its subsidiaries, including project offices. Any reference to the male gender in this document also implies the female gender. Management refers to the CEO, the COO and all their direct reports.

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1. Purpose

The purpose of this policy is to provide a framework that will guide all employees in their conduct within the workplace and with all internal and external stakeholders.

2. Scope

This Code of Ethics applies to all entities and operations within the UMS Group, irrespective of country of operation, and without exception.

3. Undertaking

The company will ensure that:

- Each employee of the Group is familiar with the Groups 'Code of Ethics' and that they fully abide by the principles set out in this code.
- Each employee appreciates the consequences (both personal and corporate) of non-compliance with this code.

4. The Intent of the Code

The UMS Group 'Code of Ethics' provides the ethical base from which all employees of the Group and its subsidiaries will conduct business relationships with stakeholders of the Group. The Group will operate as a socially responsible corporate citizen in every country where it has a presence.

5. The UMS Group Code of Ethics

This section outlines expected conduct regarding.

- General business practices.
- Our Customers.
- Our Employees.
- Our Joint-Venture Partners and Sub-Contractors.
- Our Suppliers.
- Our Competitors.
- Our Communities.
- Our Environment.

5.1 General Business Practices

- We will operate within the laws of the countries we operate, codes of industry practice and standards laid down by statutory bodies.
- We will generate business through the application of knowledge of our markets, products, and services and through building sound client relationships.
- We will operate with integrity in all our business undertakings.
- We will not resort to bribery to further our business interests, nor will we undertake any forms of anti-competitive behaviour.
- We will comply fully with all applicable international anti-money laundering laws in all jurisdictions in which we operate.

- We will not misrepresent facts to any of our stakeholders and will be transparent in our business undertakings in so far as it does not compromise trade secrets and proprietary intellectual capital.
- We will not disclose confidential business or personal information to anyone without the express permission of management and or the relevant stakeholder who holds this information.
- No employee of the Group is to pursue any private business interests that will conflict with the business of the Group either by way of competition or of diverting attention from the business of the Group. Any private business interests will be disclosed to management.
- All employees of the Group will operate within the group delegation for authority framework.
- Any employee who witnesses a violation of our Code of Ethics must report this through our Fraud and Ethics reporting line as outlined in clause 6 of this code.
- We will not engage in any employment practices that make use of forced or child labour. We will respect all employees' rights to freedom of association and all employees will not allow their freedom of association rights to negatively impact or interfere with the Company's business.

5.2 Our Customers

- We will be professional in all our business dealings to maximize our reputation as the preferred supplier of professional services, construction services and goods.
- As a minimum, we will meet our customer requirements.
- We will keep to our commitments and meet our obligations.

5.3 Our Employees

- We will continue to pursue the Group's Equity (including diversity and inclusion) objectives.
- We will adhere to all our Group's Policies & Procedures and apply them fairly.
- We will maintain sound employee relationships between all our employees.
- We will all ensure that our working practices conform to strict safety and health standards.
- We will all pursue quality and productivity goals for the good of the Group.
- We will invest in the development of all our employees.
- We will reward for performance.

5.4 Our JV Partners and Sub-contractors

- We will ensure that all our Joint Venture partners and sub-contractors fully understand and comply to our code of ethics, performance standards and requirements.
- We will foster teamwork with all our Joint Venture partners and sub-contractors.
- We will maintain professional working relationships with all our Joint Venture partners and sub-contractors.

5.5 Our Suppliers

- We will maintain good professional working relationships with all our suppliers.
- We will ensure that our suppliers understand our code of ethics, performance standards and requirements.
- We will not divulge confidential information obtained from our relationships with suppliers.

5.6 Our Competitors

- We will not speak badly of our competitors or any other organization.
- We will not divulge confidential information to our competitors in any business dealing with them.

5.7 Our Communities

- We will respect the values, culture, and beliefs of the communities in which we operate.
- We will consult with the communities where we operate on matters that may affect them.
- We will consider the communities affected by our work and will continually work towards mutually beneficial outcomes.

5.8 Our Environment

- We will respect and care for all life (people, animals, and plants).
- We will educate all staff on environmental issues.
- We will protect our ecosystems as far as possible.
- We will protect soils, water, and air from damage through our operations as best we can. We will rehabilitate what we can.
- We will control emissions from our operations and will manage waste disposal under strict constraints.
- We will operate according in accordance with all applicable environmental laws and codes as a minimum.

6. The Application of our Code of Ethics

In asking ourselves if our behaviour is ethical, we should answer the following questions:

- *Is what I am about to do illegal?*
- *Is what I am about to do dishonest?*
- *Is what I am about to do in conflict with this code?*
- *Is what am about to do going to hurt, offend or impact negatively in any way on the company stakeholders?*

If the answer to any of the above questions is 'Yes', then you should not proceed with your actions and consult with your Executive Manager.

If any Employee observes a violation of our Code of Ethics by others, then the Employee may advise the Chief Executive Officer, Chairman or Group Legal Counsel of UMS in writing of the deemed violation. Alternatively, the employee may raise the violation through the Fraud and Ethics reporting line (Fraud Cracker) for which links are available in the UMS webpage and Intranet. This will ensure anonymity for any person who wishes to raise an observed violation free from the threat of exposure.

In raising the perceived violation an Employee should include the following information:

- The name of each person involved.
- If the report involves a specific event or events, the approximate date and location of each event; and
- Any additional information, documentation, or other evidence available to support the report.

The Group will safeguard any Employee who raises a concern in good faith against retaliation, harassment, or victimization by others.

An Ethics Committee will monitor and enforce Groups Code of Ethics and may from time to time implement systems and procedures or call for the conduct audits and investigations into the ethical climate of the Company.



D. Glover
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