



Our Code of Business Ethics

Living our values & doing the right thing



everyone home safe every day



Our Values shape the culture of our business and lie at the heart of our reputation and performance as a company

A Message from the Leadership Team

As our business continues to grow, we are committed to developing a culture within CML where everyone does the right thing and takes personal responsibility for their actions.

We have developed this Code of Ethics to set out the standards of behaviour and business conduct we expect from everyone working for CML.

The Code reflects the Company values which shape our culture and define how we do business; and it is underpinned by the policies and procedures we are all required to adhere to.

The Code is there to support us in all the decisions that we make, empowering us to hold each other accountable and challenge when we feel our standards are being undermined or our reputation put at risk.

There may be times when we're faced with difficult decisions and the right course of action isn't immediately clear. These are the times when we need guidance to give us confidence that we are making the right choices. While no code can have all the answers to every situation that may arise, our Code has been written to help us 'do the right thing' and ensure our decisions and actions are consistent with our Values as a business.

It's also important that we can demonstrate to all our stakeholders that we have ethical standards, and that we care about the communities we serve and the environment around us.

CML will never compromise on doing the right thing.

We will foster a culture where everyone feels safe to speak out and we will always support you if you do the right thing.

We encourage you to read, use and live by our Code of Ethics to play your part in ensuring we have a safe, ethical and sustainable business, and protect the future of our company.

Thank you.

Our Values

We believe there are 4 core values which best describe how we work



People Focused



Customer Driven



Professional Attitude



Delivery Excellence

Our Values shape the culture of our business and lie at the heart of our reputation and performance as a company.

Everyone working at CML will be held responsible and accountable for living up to them.

Our Code of Ethics reflects our values and together they set the standard for our behaviour and provide a compass for all our decision making.

Our policies and procedures set out the rules we follow to ensure compliance with our Code of Ethics.

Scope

This Code of Ethics applies to all of us, from the Directors of CML, through all our employees, agency workers, sub-contractors, consultants and our suppliers.

We all have a shared responsibility to ask questions of ourselves and each other if we need clarification or advice on any aspect of this code.

Following this Code and the supporting policies is a fundamental requirement of working at CML.

Failing to follow the Code and supporting policies could lead to disciplinary action and, depending on the seriousness of the violation, could result in criminal prosecution.





Our Code, Your Responsibilities

As our business continues to grow, we are committed to developing a culture within CML where everyone does the right thing and takes personal responsibility for their actions.

Company Commitments	Manager Commitments	Employee Commitments
<p>The Directors of CML commit to supporting you, our employees by:</p> <ul style="list-style-type: none"> • Providing clear policies, standards and behaviours showing you how to do the right thing; • Supporting employees with appropriate training, guidance and information; • Creating an inclusive workplace where employees feel able to speak up and report issues and concerns; • Listening and responding to issues and concerns promptly; • Ensuring there is no retaliation for reporting concerns; • Requiring all our business partners and suppliers to work to the same standards of ethical behaviour. 	<p>We expect all our managers to act as positive role models.</p> <p>If you manage people, you must ensure that all individuals in your team receive the guidance and training they need to understand what's expected of them.</p> <p>We expect you to:</p> <ul style="list-style-type: none"> • Lead by example ; • Live our Values and stand up for what is right; • Know our Code of Ethics and supporting policies, and ensure your team does too; • Help your team to understand our code of ethics and our company values, and why they are important to us; • Coach your team on doing the right thing and praise the right behaviours; • Create an environment where colleagues feel confident to speak out if they have any concerns; and support employees who do; • Treat those who choose to speak out in a supportive manner; • Ensure there is no retaliation for reporting concerns. 	<p>We all have to take responsibility for doing the right thing.</p> <p>We expect you to:</p> <ul style="list-style-type: none"> • Understand this Code and follow it; • Think before you act; • Whenever and wherever you are with colleagues and business partners, treat everyone professionally and with respect. This includes off-site training and social events; • Know our policies and standards and your responsibilities under them; • Support your colleagues in doing the right thing; • Seek guidance if you are not sure what to do or you have seen or heard something that does not feel right; • Speak up where you have a concern or suspect wrong doing; • Cooperate fully in any investigations of alleged company misconduct; • Never retaliate against colleagues for reporting concerns or for providing information in any company investigation.

Living the Values: People Focused

1. Promoting Safety, Health and Wellbeing

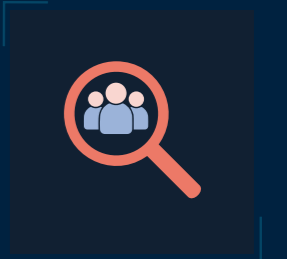
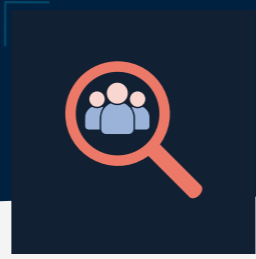
Why is this important for you?

Safety is embedded in our core values – no task is so important that it cannot be done safely. We are committed to getting everyone home safely every day and we continuously strive to develop a work environment that promotes good mental health and wellbeing for our employees.

What do we expect from you?

- Never put health and safety aside to get the job done.
- Know our health and safety standards.
- Stop any activity - including your own - that you believe is not safe.
- Never work under the influence of alcohol or drugs.
- Discuss any workplace incidents, near misses and any unsafe or unhealthy work conditions with your line manager or member of the Health and Safety team.
- Take care of your own mental health and wellbeing, be aware of the support available to you, seek help when you need it.
- Support your colleagues and know where to signpost them if you feel they need some support.





Living the Values: People Focused

2. Preventing Modern Slavery and Human Trafficking

Why is this important for you?

Modern slavery is the illegal exploitation of people for personal or commercial gain. CML have a zero-tolerance policy on modern slavery, and we will do everything we reasonably can to stop all forms of modern slavery in any part of our business or supply chain.

Modern slavery is not just something that happens elsewhere. Our sector is particularly at risk due to the complex nature of supply chain arrangements and use of subcontract labour.

Victims are controlled by force, threat, coercion and deception. It can take various forms, including trafficking of people and forced labour. We respect the human rights of anyone working for us, either directly or indirectly, so we commit to providing everyone with a safe working environment and fair terms of employment.

What do we expect from you?

Everyone has a responsibility to speak out if they have concerns relating to human rights violations or acts of modern slavery. This includes raising concerns about those we do business with.

If you have any suspicions where you are working, you have a moral duty to inform your Line Manager or another Senior Manager immediately.

Spotting the signs of modern slavery

A victim of modern slavery may:

- Look uneasy, unkempt or malnourished;
- Be unsure of their personal address;
- Have a lack of personal possessions;
- Wear the same clothes every day or wear unsuitable clothes to work;
- Be reluctant to talk to others;
- Appear frightened, withdrawn or show signs of physical or psychological abuse;
- Be dropped off and collected from work, especially at unusual times.

3. Enabling Diversity and Inclusion

Why is this important for you?

Working in a diverse and inclusive company means teams can be more creative, innovative and people happier, which delivers better results. We recognise everyone has different experiences, skills and perspectives, and encourage people to use them and work collaboratively in diverse teams. We are committed to providing an inclusive culture where people can be the best they can be. We do not tolerate harassment, bullying, intimidation or discrimination on any grounds.

What do we expect from you?

- Treat people fairly and with respect.
- Do not participate in harassment, bullying or discrimination on any grounds and Speak Up and take action if you notice it. CML have a zero-tolerance policy to such behaviour.
- Be open-minded and encourage diversity of thought amongst your teams to ensure the widest possible ideas and opinions are used.
- Do not engage in activities that are inappropriate or offensive to others. Just because something is not offensive to you, does not mean that it will not be to others.
- Take ownership of your own development and support your colleagues in their development.





Living the Values: People Focused

4. Outside Interests

Why is this important for you?

We fully support employees who wish to take up additional interests or appointments outside of CML where such appointments do not conflict with their duties to CML and there is no risk of reputational damage to CML.

We encourage employees who wish to support their local communities and charitable organisations, and we support employees who wish to undertake voluntary or charitable work through our Volunteering Scheme.

We will also endeavour to support employees who wish to take up outside appointments for personal development reasons, where the experience they gain will be beneficial to their role within CML and where there is no conflict of interest.

What do we expect from you?

You should always make sure that outside activities don't interfere with your ability to fulfill your responsibilities, and that you manage fatigue appropriately. We all have a responsibility to take care of the health and wellbeing of ourselves, as well as consider that of our colleagues around us.

- Volunteering forms an important part of our work in the community, and is actively encouraged; however, you should first discuss your intentions with either your Line Manager, or HR Manager to ensure that your chosen activity complies with our Social Value policy.
- You should seek prior approval before undertaking any community or charitable work which might require the use of company time or equipment.
- Outside of the workplace, you should be mindful of the impact that certain activities you may engage in, for example of a political or activist nature, may have on CML's business and its reputation.
- Don't agree to take up an appointment as a director, whether executive or non-executive, of a third-party company without prior approval from a Director.
- Do not engage in activities outside of work which may reflect adversely on our reputation.

Living the Values: Customer Driven

1. Preventing Insider Dealing

Why is this important for you?

While CML is not a listed company, we frequently work with other organisations that are listed on the stock exchange. The share price of some of these organisations could be affected by a procurement process that CML are involved in.

You can hold shares in organisations that do or want to do business with CML, but it's against the law to buy or sell shares (or encourage someone else to do so) based on unpublished, price-sensitive information that you've found through your work with us.

What do we expect from you?

- Using the Commercial Conflicts of Interest Register on Insight, you should declare if you, or someone you have a close personal relationship with, hold shares in an organisation that does or wants to do business with CML.
- Do not share price-sensitive information with others, or recommend or encourage anyone else to deal in shares based on price-sensitive information.





Living the Values: Customer Driven

2. Protecting Personal Data and Privacy

Why is this important for you?

We use a great deal of personal and sensitive data, such as client information, financial reports, construction specifications and employee details. We strive to live up to the confidence put in us by our customers and colleagues ensuring that this kind of information is treated carefully and securely and that we manage personal data in a professional, lawful and ethical way. Abuse of data can cause harm to you, to CML and to our clients.

What do we expect from you?

- Prevent accidental loss and unauthorised access, disclosure or destruction of personal data and confidential information.
- Process personal data only for the purposes for which it was collected.
- Keep data only as long as is necessary for the intended purpose and then securely destroy it.
- Report any suspected data or security breaches.

Living the Values: Professional Attitude

1. Avoiding Conflicts of Interest

Why is this important for you?

A conflict of interest can happen when your personal interests could potentially interfere, or appear to interfere, with your responsibilities to CML.

Conflicts of interest can arise from your family relationships, friendships, out of work activities and financial affairs. Any actual or perceived conflict of interest may jeopardise CML's reputation and your own reputation.

There are two types of conflict of interest: 'workplace' and 'commercial'.

What is a workplace conflict of interest?

This is when you have a relationship or outside activity that could cause, or be perceived to cause, a conflict of interest with your role while working at CML.

Some examples of this may include:

- Having a relationship with an individual in the company, and making business decisions about them, such as performance reviews, pay negotiations or grievance procedures;
- Having a relationship with a candidate you are considering recruiting. It is essential that all recruitment decisions are impartial, fair and based on merit;
- Taking part in an outside activity that could affect your work duties because of conflicting priorities.





Living the Values: Professional Attitude

1. Avoiding Conflicts of Interest

What is a commercial conflict of interest?

A commercial conflict of interest could occur if you are making business decisions involving a third party and you have an association with that third party company that could affect, or appear to affect, your impartiality and judgement.

Conflicts like this may occur, for example, if you are taking part in a procurement process.

Some examples of where a commercial

conflict of interest could arise include:

- Having a relationship with an individual at a supplier or an external company, including client organisations or business competitors of CML;
- Being an ex-employee of a client organisation, supplier or external company, or business competitor of CML;
- Having an association with another business, such as a Non-Executive Director position.

What do we expect from you?

- Do not let any decision you make at CML be influenced by personal interests or the interests of family or friends.
- Disclose to your manager all potential conflicts of interest as soon as you are aware e.g., outside positions, activities, financial interests or relationships.
- Withdraw from decision-making that creates an actual or perceived conflict of interest.

Living the Values: Professional Attitude

2. Preventing Bribery & Corruption

Why is this important for you?

At CML we do business honestly and build relationships based on trust. We have zero-tolerance for bribery and corruption as they are simply against our core values and this is written into all our employment contracts.

We do not receive, accept, give or promise anything of value to gain an improper business advantage. Bribery can take various forms and can include gifts, hospitality, personal benefits, offers of employment and cash. Specific guidance on gifts and hospitality can be found later in this code.

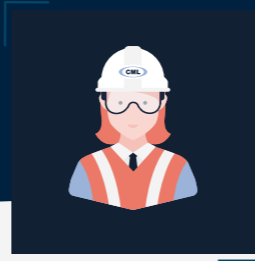
We all need to be mindful of the intentions of external parties when they offer us anything and consider whether there are any expectations attached as a result of accepting. This is especially important when we're in the process of awarding contracts or making important business decisions.

Employees found to be in breach of our Anti-Bribery policy will face disciplinary action and could be referred to the police, potentially resulting in imprisonment under the UK Bribery Act 2010.

What do we expect from you?

- Never receive, accept, give or promise anything of value to gain an improper business advantage.
- Do not agree to sponsorship or charitable donations without permission from senior management.
- Do not give or accept cash or its equivalent, (e.g. vouchers, gift certificates, accepting services in kind).





Living the Values: Professional Attitude

3. Preventing Fraud

Why is this important for you?

Fraud is an act of dishonesty intended for personal gain or to cause loss to another party, and it goes without saying that we should never do it, nor should we turn a blind eye to anyone we suspect of it.

Fraud can take three forms:

- Abuse of position; for example, using a company vehicle for extraordinary personal purposes without first seeking permission;
- False representation; for example, overstating a timesheet or over-claiming expenses;
- Failure to disclose information; for example, failing to disclose that a contractor doesn't have a Personal Track Safety (PTS) certificate.

Committing fraud is a disciplinary offence and may be referred to the police.

What do we expect from you?

If you suspect fraud, you should inform your Line Manager or another Senior Manager as a matter of urgency.

Living the Values: Professional Attitude

4. Treating Gifts and Hospitality Responsibly

Why is this important for you?

We describe gifts and hospitality as anything offered to you by someone outside of CML or anything you offer to someone outside of the company.

Gifts and hospitality could include items ranging from corporate merchandise or a bottle of wine, to tickets to events, hampers, free meals, travel or accommodation. Hospitality is only appropriate where it's necessary for the development of legitimate business relationships.

If offers of gifts and hospitality are not handled correctly, it could make the offers look like an attempt to influence decisions, and in some instances, could even be construed as a bribe.

What do we expect from you?

Never offer or accept gifts or hospitality in return for a favourable decision or business advantage.

Ask yourself the following questions:

- Does it have a business purpose?
- How would acceptance look to the outside world?
- Is the value proportionate?
- Is the timing and nature of the offer appropriate?

All offers of gifts or hospitality, both by and to you, must be registered on Insight, whether you choose to accept them or not. The only exception to this rule is when you're offered items of negligible value. If in doubt you should refer such gifts to your line manager for guidance.





Living the Values: Delivery Excellence

1. Maintaining Records and Reporting

Why is this important for you?

Our business decisions need to be taken based on accurate and precise information. Our records, accounts, policies and documents are kept in accordance with our accounting principles and guidelines. Project accounts and records must also be complete, correct and transparent. This applies for both the financial and non- financial records (relating to safety, compliance, sustainability, etc).

What do we expect from you?

- Make sure that your accounts and records are accurate and complete.
- Do not make entries that conceal the true nature of a transaction or draw up incorrect documents, such as incorrect invoices, estimates, and proposals to customers.
- Substantiate your expense claims and comply with correct policy and procedures.

Living the Values: Delivery Excellence

2. Protecting the Environment and Driving Sustainability

Why is this important for you?

We are committed to protecting the environment and ensuring that our works are being carried out strictly in accordance with environmental guidelines. We aim to build a sustainable business so we can deliver long term value for clients and the communities in which we work.

What do we expect from you?

- Support local or national volunteering activities that are aimed at protecting the environment.
- Consider and act upon ways to reduce CML's impact on climate change, e.g. avoiding unnecessary car journeys.
- Get involved. Ask questions, make suggestions and most importantly know that every one of us can help make a difference.
- Comply with environmental laws, policies and procedures.
- Minimise waste at our sites and recycle wherever possible.
- Consume resources efficiently.
- Use materials that minimise the environmental impact of our operations.
- Minimise our carbon footprint.
- Source materials in a responsible way.





All legitimate concerns raised will be treated fairly and in complete confidence.

Speaking Out

If you see a situation in which our Code is not being followed or when you suspect any misconduct, you have an obligation to speak out and report it. Speaking out is good for our business. It helps us to understand where we've gone wrong, and to learn lessons from mistakes made, rather than sweeping things under the carpet.

How can I report a concern?

You should first talk to your line manager or if you feel uncomfortable doing this, then you should approach another senior colleague.

If for whatever reason you don't want to do that, then you can report any concern using the Values and Ethics menu on your Insight dashboard.

It can sometimes take great courage to raise a concern. Even if you don't have all of the facts, a reasonable level of suspicion or evidence is enough when speaking out.

You can be assured of the full support of the Directors, and confident that no action will be taken against you for speaking out, unless a report is made maliciously or in bad faith. Any retaliation – whether direct or indirect – against employees who raise a concern may result in disciplinary action up to and including dismissal.

Speaking Out

What happens to the information I provide?

All legitimate concerns raised will be treated fairly and in complete confidence.

Investigations can take a long time and, to protect the confidentiality of all involved there may be occasions where we might not be able to give you full details of progress but wherever possible you will be informed of the outcome from any concern you have raised.

How should I report a safety concern?

Policy and procedures exist for reporting safety concerns.

How should I report a grievance issue?

If you are unhappy about any matter relating to your work, or the people you work with, you should use the formal grievance procedure.

Guidance for decision making

This Code is not a substitute for your good judgment, and it cannot cover every conceivable situation. To help you or your team think about any particular dilemma you may have, you should work through the following questions:

- Am I following the Code of Ethics?
- Can I explain this decision or action to others?
- Am I willing to be held accountable for this decision?
- Does it support CML's good reputation?
- If this becomes public knowledge, will I still feel I have done the right thing?
- If the answer to any of these questions is 'no', do not do it, the action may have serious consequences. In case of questions or doubts, always contact your manager for guidance.



