



Avove Code of Conduct

Our Business Ethics Policy

The AvoVe Code of Conduct

Our commitment to always doing the right thing.

Every day, we all make decisions that can affect others, our contracts and our company.

We are resolutely focused on ensuring employees consistently uphold the highest standard of conduct and ethics in how we work.

This policy applies to all permanent, temporary and fixed-term employees, agency staff and subcontractors.

It relates to the way we behave with our clients, employees, suppliers and the communities in which we work.

Everyone who works for or with AvoVe is responsible for understanding this Code of Conduct and the related policies, and for asking questions about anything that is not clearly understood.

Everyone who works for or with AvoVe is expected to follow the AvoVe Code of Conduct to ensure that:

1. We place health, safety and wellbeing at the forefront of everything we do.
2. We work in accordance with The AvoVe Way including our four core values.
3. We promote fair and inclusive working environments and do not tolerate harassment, bullying or discrimination.
4. We respect and protect human rights.
5. We do not permit or condone any act of fraud, bribery or corruption and we avoid conflicts of interest.
6. We protect our natural world and work to minimise our impact on the environment.
7. We do not misuse property, information or data.
8. We are transparent and report concerns.



This is how we apply our Code of Conduct



1. We place health, safety and wellbeing at the forefront of everything we do.

Safety is our highest priority. Our Work Together > Safe Together ethos flows through everything we do.

We want to ensure that everyone is always kept safe, whether they are working on a site, in an office or at home.

Work Together

This ensures that we all work as a team and remain protected, healthy and empowered.

Safe Together

This ensures that we all go home healthy and happy at the end of every working day.

There are three core areas that support our approach to health, safety and wellbeing:

- **Be Protected** – this means following RAMs, planning effectively and considering the environment.
- **Stay Healthy** – is all about making sure everyone is fit to come to work, using the right tools and is protected by wearing PPE.
- **Feel Empowered** – we are all responsible for ensuring we are kept safe and are empowered to raise issues and report anything that isn't right.



For further details, please refer to the following policies:

- Health & Safety
- Alcohol & Drugs

2. We work in accordance with The AvoVe Way including our four core values.

We are creating a working environment where everyone can thrive and achieve their full potential.

We call this The AvoVe Way and it is our pathway to ensuring that everyone feels empowered, motivated, trusted and valued.

To enable us to do that, we are growing a culture based on our vision of moving life forward and four core values:

- Respect
- Fairness
- Support
- Accountable



Everyone at AvoVe is responsible for how we act at work and is required to play their part in living The AvoVe Way by demonstrating our values and creating a great place to work for everyone.

The AvoVe Way also applies to the way that we treat our stakeholders.

Our stakeholders include clients, suppliers, subcontractors and the communities in which we work. Everyone who works for and with AvoVe is expected to:

- Develop constructive relationships with clients, suppliers and subcontractors - treating them with respect and professionalism.
- Work hard to resolve disputes at the earliest stage and escalate early within the business.
- Have a clear understanding of what our clients want from us.
- Listen to the concerns of local communities and, where we can, mitigate the impact on those communities.

We treat our suppliers openly and fairly and expect them to have the same ethical approach to doing business as we have. We do this by seeking to build long-term, sustainable relationships and communicating with them clearly and regularly.

For further details, please refer to the following AvoVe policy:

- Sustainable Procurement & Supply Chain





Our Winning Behaviours

We act with **Respect**



- We are considerate in every way that we communicate.
- We listen to each other and value different opinions.
- We challenge in a positive way and provide clear and timely feedback.

We treat people **Fairly**



- We are open-minded and flexible, giving everyone an equal opportunity to succeed.
- We are transparent and consistent in our decision-making.
- We take an active role in creating an inclusive environment where everyone feels safe to bring their 'whole' selves to work.

We give each other **Support**



- We care about our employees and look after our health and wellbeing.
- We take time to understand how people are feeling and lift each other up.
- We work as a team, winning and learning together.

We are **Accountable**



- We take ownership and pride in delivering great service.
- We set clear targets, and regularly communicate progress.
- We are proactive and agile, sharing best practice and suggesting ways to improve.



3. We promote fair and inclusive working environments and do not tolerate harassment, bullying or discrimination.

Above is committed to achieving an inclusive working environment that values equality, diversity and inclusion.

We are inclusive and treat everyone fairly.

This means treating everyone with respect, regardless of age, gender, disability, marital status, race, colour, nationality, ethnic or national origins, responsibility for dependants, religion, belief, trade union activity or sexual orientation.

We actively support our employees to realise their full potential.

For further details, please refer to the following Above policies:

- Inclusion
- Dignity at Work
- Recruitment & Selection
- Diversity & Inclusion Recruitment
- Flexible Working
- Hybrid Working

4. We respect and protect human rights.

We do not exploit anyone. We uphold the rights of all those who work for and with us and of the communities in which we operate.

This means refusing to do business with any person, company or organisation that fails to uphold the standards and principles of basic human rights or has links with an oppressive regime that gives us cause for concern.

We do not tolerate forced, debt-bonded, indentured labour practices or human trafficking.

We expect every party with whom we have dealings to adhere to the principles of the Modern Slavery Act 2015.

For further details, please refer to the following Above policy:

- Modern Slavery & Human Trafficking Statement



5. We do not permit or condone any act of fraud, bribery or corruption and we avoid conflicts of interest.

It is essential that we conduct our business in full compliance with the law.

We are committed to ensuring that our dealings with all concerned are conducted professionally, fairly and with integrity in an open, honest, transparent and corruption-free environment.

We compete for business based on the quality and value of our services and through a strong reputation as an expert, responsible and agile company. We comply with all competition laws. Violation of such laws is a serious matter and can result in significant penalties, business restrictions and reputational damage.

We are diligent in the way we calculate and pay our taxes and expect all of our external stakeholders to act in the same way. We look out for where this may not be the case and act with integrity.

Conflicts of interest arise if someone participates in or promotes an activity in which they have a personal interest or that personally benefits them, or their families or friends, or which might interfere with Avove's ability to carry out our responsibilities to our clients and others.

It is important that we avoid conflicts of interest. Everyone who works for and with Avove is expected to disclose any conflicts of interest that they become aware of to their line manager who should then escalate as necessary.

For further details, please refer to the following Avove policies:

- Gifts & Hospitality
- Anti-corruption
- Anti-Fraud
- Travel
- Expenses
- Compliance with UK & Euro Competition Law
- Risk Management



6. We protect our natural world and work to minimise our impact on the environment.

Avove is committed to protecting and enhancing the environment in which it works.

Avove plays a crucial role in the future of the UK's critical infrastructure and is committed to ensuring that all key decisions are made with sustainability in mind.

We are signatories to the Science Based Targets Initiative (SBTi) underlining our commitment to a credible Net Zero journey. We always strive to promote new ideas, methods and innovations to reduce the environmental impact of our activities, delivering carbon efficient solutions and supporting biodiversity.

All colleagues and supply chain members are expected to adhere to the highest standards of sustainable practices.

For further details, please refer to the following Avove policy:

- Environmental



7. We do not misuse property or data.

Avove understands the value of the information it holds on behalf of our clients and employees.



This information must only be used for the purpose for which it is held or given and must be correctly stored only for the duration that it is required.

Everyone who works for and with Avove is expected to:

- Protect confidential and personal information and keep it secure.
- Promptly report any loss of personal data/information including the loss of a laptop or a mobile phone.
- Not take unnecessary risks e.g. with the use of memory sticks or use information for purposes other than as intended.

We only use Avove assets for work purposes and not for personal use or gain. Avove assets include physical assets such as equipment, commercial vehicles, plant, materials, laptops, phones, software and systems, along with any intellectual property rights.

For further details, please refer to the following Avove policies:

- Information Security Management
- Data Protection & Document Retention
- Acceptable Use

8. We are transparent and report concerns.

We carry out our operations on an open and transparent basis.

Everyone who works for and with Avoxe is expected to:

- Ensure accuracy in financial and performance reporting following company policy and the recognised accounting standards (FRS102) which are adopted by the company.
- Comply with internal commercial and financial controls and only process transactions in accordance with the Delegated Authorities Matrix (DoA).
- Ensure all company communications and disclosures have received appropriate internal review and approval.



For further details, please refer to the following Avoxe policy:

- Delegation of Authorities Matrix (DoA)



Whistleblowing

There are multiple channels available for people to raise concerns.

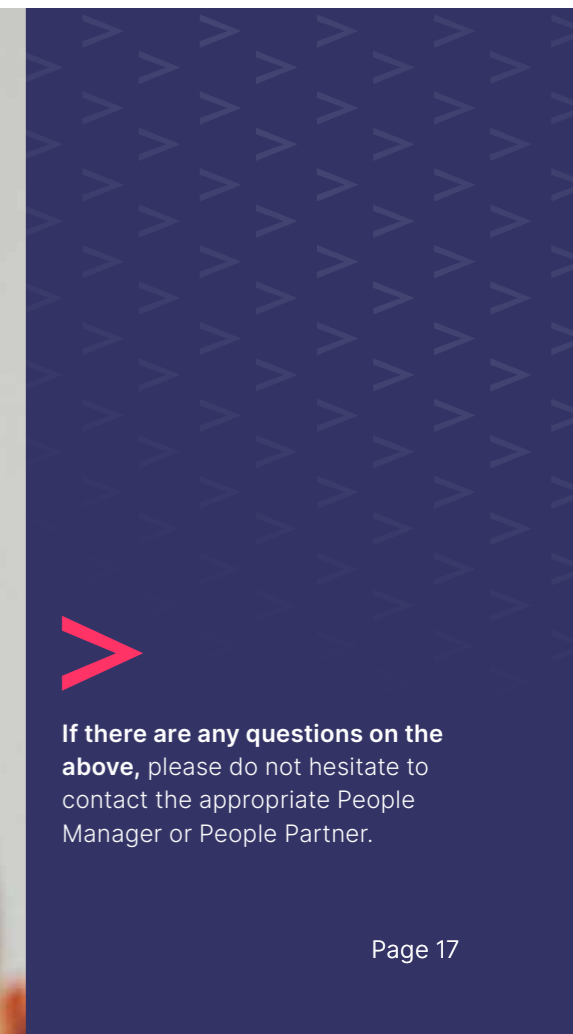
Before raising a concern, please first consider whether the matter can be resolved locally by raising it directly with the person involved or with their People Manager.

If that is not appropriate, then employees should consider speaking to their People Partner.

Avoxe has a Whistleblowing Helpline which can be used by anyone. It is provided by an independent third party, who will seek to ensure that concerns about any wrongdoing or malpractice are properly raised and, if requested, responded to.

For further details, please refer to the following Avoxe policy:

- Whistleblowing



If there are any questions on the above, please do not hesitate to contact the appropriate People Manager or People Partner.

AVOVE

UTILITIES

MOVING LIFE FORWARD

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