

**CODE of BUSINESS ETHICS AND CONDUCT  
POLICY**Issue No: 02  
Issue Date: 29/09/2023

Haigh Rail recognise the importance of adhering to the principles of ethical business conduct in the successful delivery of its activities and is committed to operating its business, both sustainably and responsibly and to the highest ethical standards.

We have in place standards and practices that ensure we act thoughtfully and behave fairly, wherever we are and whatever we're doing. This gives our customers, employees, subcontractors, suppliers, investors, and the many communities we serve, the confidence to trust and do business with us.

This Code of Business Ethics and Conduct applies to all Haigh Rail Directors and employees (whether permanent or temporary), customers and through our supply chain (subcontractors and suppliers).

Haigh Rail will conduct its business honestly and fairly at all times, complying with all applicable laws and industry codes, standards and guidance, including:

- **Bribery and Corruption**

Haigh Rail is committed to ensuring that its business operates with the utmost integrity and that we and our employees will not offer, promise or pay bribes to anyone, or request, agree to accept or receive bribes or otherwise breach applicable laws on bribery and corruption.

- **Competition**

Haigh Rail is committed to ensuring the highest standards of competition law compliance within the industry by adhering in all of our business practices to the principle of fair competition and to ensure that we do not engage in conduct which is anti-competitive.

- **Health, Safety and Welfare**

Haigh Rail is committed to work collectively, with clients and our supply chain, to improve the standard of health, safety and welfare throughout its activities. We are fully committed to the prevention of accidents, injuries and ill health to employees and others who may be affected by our work.

- **Environment**

Haigh Rail is committed to the protection of the environment in which we operate and to continual improvement in the environmental performance of the key issues facing us - energy, waste, water, low carbon construction, biodiversity, community engagement, and materials (including sustainable material procurement).

- **Employment Practices**

Diversity of the workforce is a cornerstone of good business. Everyone, regardless of their sex, race, age, disability, pregnancy and maternity, religion or belief, gender reassignment, marital and civil partnership status, sexual orientation, responsibility for dependents, should and will be treated equally, with fairness, honesty, respect and dignity, and will respect the human rights of everyone working on our behalf. Haigh Rail will not tolerate or condone any form of discrimination.

- **Pre-Employment Checks**

Haigh Rail ensures that pre-employment checks on job applicants are conducted in a legal and ethical way and the laws on discrimination and data protection are respected.

- **Supporting our Supply Chain and Fair Payment**

Haigh Rail is committed to working collaboratively with its supply chain to improve performance and productivity by reducing waste and cost, whilst ensuring certainty of payment and prompt payment to subcontractors.

- **Unethical Behaviour and 'Whistle-Blowing'**

Haigh Rail promotes a working environment which encourages all members of our team to express their concerns about behaviour or decisions that they perceive to be unethical without fear of reprisal or victimisation. The Managing Director is responsible for initiating and supervising the investigation of all reports of breaches of these principles and policies and ensuring that appropriate disciplinary action is taken when required.

Our reputation is a key business asset – indeed it is fundamental to our long-term success. In summary, we expect our people to conduct business in good faith, acting with honesty and integrity, to maintain the trust and confidence of our clients, subcontractors, suppliers and other interested third parties.

Signed:



(Managing Director) Dated: 29/09/2023