



## HONEST AND ETHICAL BEHAVIOUR POLICY

### 1 Introduction

- 1.1 This policy sets out Bazalgette Tunnel Limited and its group companies (“BTL”) commitment to conducting all aspects of business in an honest, open and ethical manner on the Thames Tideway Tunnel project (the “Project”).
- 1.2 Our parent companies, stakeholders and the community are entitled to expect BTL to comply fully with its legal responsibilities, as well as its core business values and ethical principles.

### 2 Application

- 2.1 This policy applies to BTL and CH2M including all employees, consultants and direct contractors of each company working on the Project (“Tideway”).
- 2.2 BTL expects that its main work contractors, framework providers, independent contractors and sub-contractors, suppliers and partners working for and on behalf of Tideway have a similar policy and procedure within their organisation to which they will comply.

### 3 Principles and rules

- 3.1 BTL seeks to promote a culture of honesty and integrity in all its dealings and it will not tolerate acts of fraud, dishonesty, bribery, corruption or theft of assets or data from the business. BTL is also committed to ensuring that neither Tideway’s integrity nor reputation is put at risk. It expects everyone working on the Project to be open, honest and fair in dealings with colleagues, staff, business partners, suppliers and the community at large and treat them with respect.
- 3.2 Tideway achieves this through the effective use of systems and processes to help identify and manage:
  - a. **Conflicts of Interest (COI)** – BTL expects to be advised of any relationships which may potentially or do give rise to a conflict of interest. Full details are located in the *Conflicts of Interest Policy*.
  - b. **Offers of Inducements, Gifts and Hospitality** – Anyone working for Tideway must not receive, give or accept any benefit to or from customers, suppliers, officials or regulatory bodies as a result of their work on the Project, unless this has been properly authorised by their Line Manager/Head of team/department and/or the Tideway Conflicts Committee. In all cases, hospitality given or received must be in order to build and develop relationships to the benefit of the Project and should not be for the

primary benefit of individuals. Full details are located in the *Gifts and Hospitality Policy*.

- c. **Fraud and Dishonesty** – Acts of fraud, dishonesty, bribery, corruption, theft of assets or improper disclosure of confidential information will not be tolerated, whether committed by Tideway employees, (sub) contractors, consultants, suppliers and partners working for and on behalf of BTL. BTL will therefore treat these issues very seriously and expects all occurrences to be reported immediately, failing which those responsible may be subject to the *Tideway Disciplinary Policy* or the applicable disciplinary policy.

All individuals are reminded that it is a criminal offence to offer, promise or give any financial or other advantage to any other person (including business partners, suppliers, officials or regulatory bodies), if your intention is to induce them to act improperly in their business or public function. In addition any contravention of the Bribery Act 2010 by an individual associated with BTL may expose BTL to criminal liability. Full details are located in the *Anti-Fraud, Corruption and Bribery Policy* and *Anti-Money Laundering Policy*.

- d. **Whistle-Blowing** – BTL is committed to maintaining the highest standards of honesty, openness and accountability. It is essential that everyone working on the Project shares this commitment and feels able to raise concerns confidentially, so that appropriate and timely steps can be taken. Any persons failing to take any action could lead to them being viewed as negligent or complicit in any inappropriate acts and may lead to them being subject to disciplinary action. Full details are located in the *Whistle-Blowing Policy*.
- e. **Modern slavery** – BTL does not tolerate modern slavery (as defined by the Modern Slavery Act). It has a zero tolerance approach to modern slavery and is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its own business or in any of its supply chains.

3.3 Compliance with this policy is essential to the protection of Tideway's reputation. Any person who is found to have acted in contravention of this policy or its principles may be subject to disciplinary action, and/or removal where the breach amounts to gross misconduct.

Signed:



**Andy Mitchell**  
**Tideway**

Chief Executive Officer

Date: 25-10-2017

I acknowledge receipt of the *Tideway Honest and Ethical Behaviour Policy* and agree to abide by its contents for the duration of my work for or on behalf of BTL on the Project.

**Name (PRINT):**

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**Job Title:**

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**Signed:**

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**Date:**

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