



BMT (OFFICIAL)

Employee Code of Conduct

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Foreword

By Sarah Kenny

The BMT Employee Code of Conduct is one of the ways we put our values into practice. It recognises that everything we do in connection with our work will be, and should be, measured against the highest possible standards of business conduct.

Our commitment to these high standards helps us stand out from our competitors, employ great people, develop and deliver great products and services, and attract loyal customers. Respect for our customers, the markets in which we operate, and for each other are foundations to our success; they are all things we need to support every day. By doing so, we will build the market reputation our people, products and services deserve, deliver clarity from complexity, and support the achievement of our business goals.

So please do read the Code and our values, and follow them both in spirit and letter, always bearing in mind that each of us has a personal responsibility to 'live', and to encourage our colleagues to 'live', the principles of the Code and our values. If you have a question or ever think that one of our colleagues or the company may be falling short of this commitment, don't be silent. We want – and need – to hear from you.



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Introduction

The Code helps us to make good decisions every day

The Employee Code of Conduct (The Code) sets out BMT's values and the standards of employee behaviour expected of us all in the workplace. It is designed to guide us in our actions and work activities and help us make the right decisions and do the right thing. It helps situate the behaviours described in BMT's behavioural competencies, bringing them and our values 'to life' through working examples and case studies, enabling us to consider and reflect on some of the ethical dilemmas we could face in our day-to-day work.

Vision

BMT's vision is to be a trusted global leader in delivering solutions to the most important and impactful engineering challenges of our time. We want to be recognised for our collaborative and partnering approach, investing not only in our future, but in the futures of others through our work in communities, education and the environment.

To achieve this vision, we all have a role to play in ensuring our day-to-day actions helps to create this trust. Trust in the way we work; trust that we work and behave ethically and legally; trust that we will treat everyone with respect and build open and transparent business relationships; trust that we will bring the full breadth and depth of our experience to meet the challenges of our customers.

The Code is based around our BMT behavioural competencies

The full suite of competencies is available here

[Career Map](#)

Purpose of the Code

The Code lays out clearly and succinctly the minimum standards expected of us all as we conduct our work and represent BMT. It aims to elevate the key elements of our policies in an easily digestible and understandable format and thereby help us live and breathe our values. The Code enables us to:

- Conduct ourselves honestly and ethically
- Uphold our values and protect BMT's reputation
- Understand what BMT expects from us
- Comply with the laws, regulations and standards that apply to BMT
- Understand where to go for assistance or guidance if we have questions.



Who Is Covered Under the Code

It does not matter where we work or what we do for BMT, we all have a responsibility to use good judgment and follow our Code. That includes every full-time or part-time employee at every level of the Company. We must all acknowledge that we have read and agree to uphold the Code.

Anyone who works on our Company's behalf (including suppliers, consultants, and other business partners) must share our commitment to our values by following the principles of our Code when providing goods and services to us or acting on our behalf. Suppliers, as a condition of working with us, must comply with our Supplier Code of Conduct.

What You Need to Do

Employees

As employees, we all have a responsibility to:

- Know and live the Code. Read it and follow it, along with any other policies that apply to our role.
- Think before we act. Use good judgment, being honest and ethical in every action we take. If we are asked to violate the Code, we must not do it. We must report the concern as soon as possible using the resources available to us.
- Follow the law. Understand laws that apply to our jobs and our business. If we are ever unclear about a law or regulation, we must ask for guidance.
- Ask for help. When an answer is not clear, we must ask for guidance before acting.
- Stay alert. Pay close attention to any activity that is inconsistent with our Code, our policies, or the law.

- Report concerns. We must not ignore a violation. Prevent harm to our Company and its reputation by reporting your concerns immediately.

Managers

If we are in a management position, we have additional responsibilities. We must:

- Model the Code and our values. Promote a culture of integrity by making ethical decisions and showing honesty and integrity in everything we say and do.
- Never encourage or direct any employee to achieve a business result at the expense of violating our Code or the law.
- Talk about the Code. Read the Code and understand it. Refer to it. Make ethical conversations part of our routine.
- Be informed. Recognize that we may not always find the answers that we need in the Code, so we need to know where to go for answers when there are questions.
- Expect the best. Discuss the importance of ethics and compliance and let our employees know you expect them to always do what is right.
- Be responsive and create a “speak up” culture. Encourage employees to come to us with questions or concerns. Listen to them carefully and offer guidance when they need help, including identifying available resources for reporting. Also, be careful not to create an environment where employees feel they can only bring concerns to local management.

Our Values

- We keep our promises
- We do everything with integrity
- Our customers can always rely on us to perform and deliver as their trusted partner

Trust



- We combine knowledge and expertise to develop insights into tomorrow's problems
- We value the creativity, ingenuity and knowledge of everyone in our business
- We are imaginative and agile in our thinking and adaptable in our delivery

Innovation



- We respect our customers, partners and colleagues, investing in building enduring relationships on which we depend
- We respect the environment in which we operate and seek to have a positive impact
- We value diversity of thought and people
- We are committed to the safety and wellbeing of everyone involved in our business

Respect



- We're passionate and proud of our work
- We love the challenge of solving our customers' most complex problems
- Performance matters - we are passionate about delivering meaningful outcomes
- We are passionate about engaging with and investing in the communities in which we operate

Passion



- Collaboration is at the heart of our business
- We empower teams to achieve their potential, going further than any person could alone
- We are driven to succeed and share that success with all our people

Collaboration



Our values are embedded in BMT behavioural competencies.

The full suite of competencies is available here. [Career Map](#)

Our commitment to work legally.

We take our responsibilities to comply with laws and regulations very seriously and as such, each of us is expected to comply with applicable regulations. While it is impossible to know all aspects of every applicable law, we should understand the major laws and regulations that apply to our work. If in doubt, we should ask. Some common areas of potential risk are as follows:



Business Agreements

Bribery

Like all businesses, BMT is subject to many laws that prohibit bribery in virtually every kind of commercial setting. The rule for all of us is simple – do not bribe anybody or accept bribes, at any time, for any reason.

Business Agreements

Some agreements with customers, suppliers, competitors, or other business partners have the potential to limit free and open competition, so if we are responsible for areas of our business where antitrust or fair competition laws apply, we must know how they apply in the country (or countries) where we operate. For example, we must never enter into any agreement or understanding, even an informal understanding, with a competitor to set prices on our products and services, divide territories, markets or customers or prevent another company from entering the market. If in doubt, we should ask our manager, or contact our local Commercial Manager.



Copyright and Trademarks

Third Party Intellectual Property

Our work often involves using the intellectual property of our clients, partners, and suppliers. When we do, we must make sure that we do not share this intellectual property inadvertently with others, and only share what is admissible in our contracts. When using images or quoting any copyrighted or protected material, we must reference the source in any disclosure.

Please refer to our [Data Protection Policy](#) for further guidance.

Personal Information

Many of us work with Personal Information (including sensitive personal information) relating to our employees, and sometimes the personal information of our clients, partners, and suppliers. If we are in this type of position, we must guard this information well by following our policies regarding the access, transfer and use of this information. If we are not sure whether we are handling personal information or whether our use is in accordance with our policies and procedures, we must ask our manager.

Further information is available in our [Data Protection Policy](#).



Tax Evasion

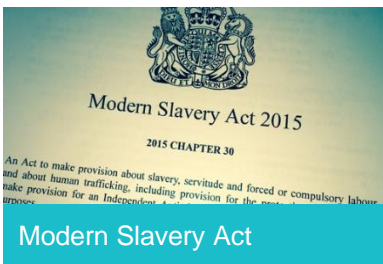
Tax Evasion is a criminal offence in all the jurisdictions in which the BMT Group operates worldwide. Certain Tax Avoidance strategies may be considered to be a form of Tax Evasion by certain Tax Authorities. Significant criminal and financial penalties could be imposed at both a corporate and individual level if BMT and/or individual employees were found to have contravened Tax Evasion legislation. Additionally, resultant reputational damage could be severe.

If we ever become aware of or have a concern that activity within BMT, one of our suppliers, business partners or customers, is being deliberately designed or constructed to facilitate a reduced payment of tax (whether in the form of corporate tax, personal income tax, VAT or any other tax payable) then we should report that concern immediately.

Further guidance is available in our [Anti-Facilitation of Tax Evasion \(AFTE\) Policy](#).

Health & Safety

We all have a responsibility to work safely and ensure the safety, health and wellbeing of ourselves, our colleagues, and all we interact with. If we see something that is unsafe, we must intervene to stop the unsafe occurrence and report it immediately. There is much more information on our Health & Safety obligations later in this Code.



Modern Slavery

We have zero tolerance for forced labour, and we have procedures in place to check that our suppliers, contractors, and those that work with us hold the same values and do not permit forced, child or trafficked labour.

Please read our [Modern Slavery & Human Trafficking Statement](#) on the BMT Group website.

Our commitment to treat each other with respect.

Valuing our people

At BMT we place high value on, and consistently promote BMT's behavioural competencies. We expect behaviour that is professional, respectful, inclusive, and positive. We do not tolerate behaviour that constitutes harassment, bullying, victimisation and direct or indirect discrimination.

This extends beyond the day to day, to any work-related experience or setting. For example, attendance at Company or Industry events, parties, client meetings or events, and interactions on social media platforms.

Further guidance and information on this is available in our [Valuing Others Policy](#).

Valuing fair treatment & dignity

We recognise that the business has a responsibility to respect human rights, and there is a moral case to ensure that it is upheld within BMT operations and supply chains. We are committed to ensuring that all employees work in an environment that promotes mutual trust, respect for equal opportunity and no unlawful discrimination or victimisation.

Our employees' work is conducted based on freely agreed and documented terms of employment. It is important to us that everyone is paid a fair wage (including a total remuneration package that meets or exceeds the legal minimum standards), and providing clear and transparent, fair and confidential procedures for employees to raise any concerns they may have.

Further information is available in our [Reward and Benefits Policy](#).

Valuing diversity and inclusion

We are committed to ensuring that no person or group of people will be discriminated against or put at a disadvantage because of any perception of, association with, or any particular characteristic pertaining to gender, race, disability, marital status, religion, beliefs, gender reassignment, age, sexual orientation, pregnancy & maternity. These descriptions are non-exhaustive, and all characteristics are subject to local legislation. We aspire to build a culture that values openness, fairness, collaboration, and transparency.

Our commitment starts with engaging with the best possible candidates from the widest talent pool available and is subsequently applied to recruitment, talent management, learning and development, performance management and all areas of the employment experience. We recognise that people thrive in an environment where their unique contribution and encouragement to be innovative is both actively sought and valued; we want everyone to feel they can be their authentic selves at work.

Further guidance and information is available in our [Diversity and Inclusion Policy](#).

Our commitment to work ethically.

In addition to our legal responsibilities described above, we work to the highest ethical standards, and in doing so, support our goal of being a trusted partner and a valued member of our business community. Building this trust is a cornerstone of our values and is ably supported by our commitment to compete fairly and work openly and transparently in our markets.

Conflicts of Interest

We must all avoid conflicts of interest and circumstances that reasonably present the appearance of a conflict. When considering a course of action, we should ask ourselves whether the action we are considering could create a benefit, or appear to create a benefit for ourselves, our friends or family, or an associated business. If the answer is “yes,” the action we are considering is likely to create a ‘conflict of interest’ situation and should be avoided.

Please refer to the [Conflict of Interest Policy](#) for further information.

Gifts and Hospitality

Giving Gifts & Hospitality. We should be careful when we give gifts or pay for meals or entertainment on behalf of BMT. We need to avoid the possibility that the gift or hospitality could be perceived as a bribe, so it is always best to provide such gifts and hospitality infrequently and, when we do, to keep their value moderate. If in doubt, we should ask our managers on what is considered appropriate, and always record the gift and hospitality if it exceeds the reporting threshold.

Receiving Gifts & Hospitality. One of the pleasures of working with clients, partners and suppliers is that occasionally we are offered gifts or hospitality. It is perfectly acceptable to accept these gifts and hospitality if they are reasonable and are not offered (or could be perceived to be offered) to influence our decisions. Again, if in doubt, we should ask our managers for guidance, and again, if the gift or hospitality exceeds the reporting threshold, we must record it.

Please refer to the [Gift & Hospitality Policy](#) for further guidance.

Business Relationships

We must promote positive business relationships and never take unfair advantage of anyone by misleading or deceiving our customers. We must be truthful about BMT and the services we offer. We must not make any claims we cannot substantiate or make inaccurate remarks about our competitors or erroneous comparisons between their products and ours.

Obtaining information about our competitors is a normal business practice and necessary to be an effective competitor, but we must make sure we do so properly. We must make use of public or other permitted sources and be honest about who we are and who we work for when obtaining this information. We must never ask someone else to gather competitor information using illicitly or questionable practices.

Our commitment to work safely and sustainably.

Health and Safety

We are committed to ensuring all people working on behalf of BMT work in a safe and healthy working environment. This commitment extends to people working at home or alone who may face additional risk to those normally associated with BMT activities, owing to the lack of other employees or third parties to assist them should they require assistance. For these employees it is important that reasonable precautions and associated risks are assessed, discussed with their manager, removed where possible and control measures are implemented.

BMT undertakes a variety of hazardous projects around the world, all of which will require dedicated training, risk assessments and safe working practices to be followed. However, it is driving that represents the highest health and safety risk to the greatest number of us. Therefore, all of us are trusted to comply with the [Global Driving Policy](#). This means we must not drive tired or after long-haul flights, and we must limit driving distractions like mobile phone usage or programming satellite navigation systems while moving. We must follow road traffic regulations, be courteous, and always comply with the law.

BMT believes that a proactive approach to Health, Safety and Wellbeing is fundamental to the success of our business. This means that we adopt a positive mindset, and we are passionate about promoting all aspects of health, safety and employee wellbeing, taking a holistic approach to physical, mental and financial health. We believe that good health and wellbeing is a core enabler of employee engagement and high performance and fostering wellbeing initiatives will create a positive working environment where we can all thrive.

It is therefore the responsibility of us all to take responsibility and be aware of our own health, safety and wellbeing, promptly report unsafe or hazardous conditions, comply with all Company policies, standards and procedures relating to health and safety and applicable health and safety laws and regulations.

More information is available in our [Health & Safety Management Policy](#).

Sustainability

BMT is committed to embed sustainability into the core of our business, to mitigate our impact, anticipate customer needs and drive innovation and a competitive advantage in a way that respects the environment and creates value for society. Through operations and projects, we must strive to follow our sustainability principles and objectives within the remit of our roles, towards becoming a more environmentally responsible and ethical business.

For example, travel (including that funded by clients) forms a considerable proportion of our carbon footprint and business expenditure, therefore we should only travel when video conferencing and teleconferencing is not a suitable alternative. In these instances, our [Travel Policy](#) supports BMT employees in meeting sustainability requirements – to travel in the most economically and sustainable way possible, consistent with effective use of time.

For more information, please refer to our [Global Sustainability Policy](#).

Our commitment to protect our assets and reputation.

Property and Information

[Global ICT Policies](#) ensure that our use of BMT's computing and telecommunications resources supports our business, customers, and our colleagues in the best possible way. Their purpose is to enable us to understand the Company's rules and guidelines surrounding the use of technology, applications, Internet and cyber and information security. Information Security is the responsibility of all of us.

The application of layered defence to the protection of systems is enhanced using successive layers of physical security. The first layer of security is the use of Security Zones. The second layer in the protection of systems is the use of a higher Security Zone or secure room for a server room or communications room. The third and final layer is the use of lockable commercial cabinets or security containers. All layers are designed to limit access to people without the appropriate authorisation to access systems. All our offices have the appropriate security layers in place.

Our office properties are where we feel a sense of belonging and a place where we can be with our colleagues to collaborate and share ideas. It is a place where we forge a positive and trusting relationship between each other and our clients. We should be respectful, and we should all feel a sense of responsibility to keep our office secure. To enhance our workplace security, we should be familiar with and follow any work safety information and training provided to us.

Reputation

We are committed to protecting and maintaining a strong and positive reputation so that we can continue to attract dedicated, talented people who share our passion for what we do, and continue to build enduring relationships with customers, partners and colleagues. Our reputation is defined by how others perceive us and the perception of BMT as a business is based either on direct interaction with us or on things that the public has seen and heard about us. Our corporate identity thus plays a critical role in shaping that public perception and it is our responsibility, as set out in our [Global Brand Policy](#), to market ourselves with a single, consistent corporate identity to maximise our brand recognition.

With the increasing importance of social media for businesses, it is also essential that we protect our reputation online and through our social media presence, as defined in our [Global Social Media Policy](#). By taking control of our reputation and creating a strong and memorable brand in the public perception, we will help avoid any confusion about who we are and what we stand for.

Further guidance and information is available in our [Social Media Policy](#) and [Brand Policy](#).

Our commitment to listen to concerns.

Maybe you sense that something is not right at work. Maybe you saw something or heard about an act that may violate our Code, our policies, or the law. If so, you have a responsibility to share your concerns by reporting right away – even if you are not sure that a Code violation has occurred.

When you report concerns, you help us handle issues properly, fix problems before they occur and remedy situations that have already happened. You also help build trust with each other and with our customers, our suppliers and other business partners.

You can raise concerns with your manager, but if you do not feel comfortable in doing so, you can raise your concerns anonymously through the 'Raising Concerns Hotline'. We will treat all reports in a confidential manner, conduct a fair and objective investigation, and take appropriate corrective steps.

For more information, please refer to the [Raising Concerns Policy](#).

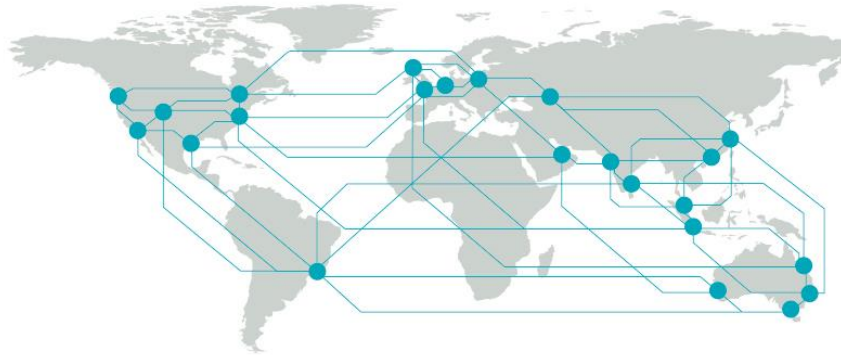
Raising Concern Hotline

You can raise a concern:

- On the web portal – <https://wrs.expolink.co.uk/bmtglobal/ethicspoint.com>
- On the mobile friendly application - bmtglobal.navexone.eu
- By calling the Expolink phone number
 - Australia - 1800 121 889
 - Belgium - 0800 71025
 - Canada - 1888 268 5816
 - Netherlands - 0800 022 9026
 - Singapore - 800 4411 140
 - United Kingdom - 0800 374 199
 - United States - 1877 533 531



BMT (OFFICIAL)



BMT is a leading design, engineering, science and management consultancy with a reputation for engineering excellence. We are driven by a belief that things can always be better, safer, faster and more efficient. BMT is an independent organisation held in trust for its employees.

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