

HUMAN RIGHTS POLICY

Adopted by the Board on 1 August 2022

This policy applies to Morgan Sindall Group plc, our subsidiaries, and entities in which we hold a majority interest. While we primarily work in the UK, we believe that we have a responsibility to ensure that human rights are understood and observed in the areas that we work, including those of our suppliers, who may be based outside our main country of operation.

We respect and support the dignity, wellbeing and human rights of our employees, workers in our supply chain, communities in which we live and those affected by our operations. We recognise we must diligently act to avoid infringing on the rights of others and address the adverse impacts of our operations.

While it is the duty of governments to protect human rights, we endeavour to conduct our business in a socially responsible and ethical manner consistent with human rights principles. Our approach to human rights is guided by international standards; we respect and support the UN Guiding Principles on Business and Human Rights and the UN Universal Declaration of Human Rights. We respect the rights of individuals who may be particularly vulnerable, including but not limited to women, LGBTQ people and minorities.

We do not tolerate threats, intimidation, physical or legal attacks against human rights defenders, including those exercising their rights to freedom of expression, freedom of association, peaceful assembly, and protest against our operations and expect our suppliers to make the same public commitment.

We are committed to working collaboratively with suppliers, civil society, the government, and other businesses on human rights to inform our approach, share our experiences, and help address root causes and influence systemic positive change. Through appropriate contractual arrangements and our sustainable procurement principles we make our suppliers, i.e., those with whom we have a direct contract for goods or services, aware of and expect their compliance with our human rights commitments.

We have policies and processes in place to identify, prevent or mitigate human rights risks and to remediate any adverse impact our operations have caused or contributed to. We are committed to building awareness and knowledge of our employees and suppliers on human rights, encouraging them to speak up, without retribution, about any concerns they may have.

We continuously evaluate our operations and supply chain to identify, assess and address human rights risks and to engage key stakeholders. These evaluations include the ongoing development and implementation of due diligence processes to identify and mitigate potential impacts on human rights.

Our principles

Diversity, non-discrimination, and non-harassment

We value diversity in our employees, and in our customers, suppliers, and others. We provide equal employment opportunity for all applicants and employees. We are committed to ensuring that all employees are treated equally, and we do not tolerate discrimination or harassment based on race, colour, religion or religious creed, gender, marital status, gender identity, gender expression, sexual orientation, national origin, ancestry, ethnic origin, citizenship, age, military and protected veteran status, genetic information, pregnancy, disability, medical condition, or any basis protected by law.

Prevention of human trafficking, forced labour and child labour

We do not tolerate the use of child labour, forced labour or human trafficking in our operations or supply chain. We forbid harsh or inhumane treatment, including corporal punishment or the threat of corporal punishment, in our operations and supply chain.

Workplace health and safety

Our number one priority is to protect the health, safety, and wellbeing of everyone connected to our business. We provide a safe and healthy workplace with appropriate rules and practices for reporting and preventing accidents, injuries, and unsafe conditions and for procedures and behaviours to protect our employees, suppliers, and communities.

Freedom of association

We respect freedom of association and our employees' right to join, or not to join, third party organisations such as labour unions or other lawful organisations of their own selection, along with the right to bargain or not bargain collectively, in accordance with local laws, without fear of reprisal, intimidation or harassment. We are committed to fostering open communication between our employees and managers and providing our employees with appropriate access to grievance mechanisms and remedial action.

Supply chain

We expect our suppliers to adhere to these same principles and respect human rights in their operations and business relationships. We expect our suppliers to have in place policies and due diligence measures to ensure adherence to these principles.

Stakeholder engagement

We work to support the communities in which we operate by engaging with our stakeholders and taking into account their views related to our business.

We will continue to review and update our policy and our related programs based on consultation with our stakeholders, divisional MDs, and the Board.