

**CODE OF CONDUCT - STANDARD**

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**MCE GROUP STANDARD****CODE OF CONDUCT****(ISO 9001:2015, ISO 14001:2015, ISO 45001:2018)**

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**LEAD, INSPIRE AND SPEAK UP**

MCE is a remarkable firm. We have a strong ethos and are committed to being a force for good. You should feel proud to work here, as I do.

Central to that ethos, is our focus on conduct. Embodying good conduct goes deeper than simply following a set of rules or policies; it is a way of life. Every decision you make, and everything you do, should be done with good conduct at the front of mind, even when no one is looking.

Each of our thoughts, our words and our deeds, defines the work culture we nurture at the Firm. The responsibility to do the right thing therefore rests with every single employee, in every market, across every rank and every role.

When a client begins a relationship with this Firm, they put their trust in us; they trust us to do the right thing. We must not let them down. The Group Code of Conduct is here to help you achieve this.

The Code has been developed to encourage honest business relationships. The Code is supplemented with resources that will support you especially in situations which may be challenging or unfamiliar.

The Code is not something to be glanced at just once and then filed away. It needs to be embedded in how we do business. All of us need to know it and understand it.

Of course, no single document can spell out what's right and what's wrong in every situation, so we expect you to exercise good personal judgement, integrity and a strong sense of personal accountability when you make decisions. Take the time to read and imbibe the contents of this code; it is there to guide and protect you, as well as the Firm and its Clients. Be vigilant, knowledgeable and challenge when you see something that doesn't feel right. You may reach out to your line manager, your regional management team or to the highest level of management, where you feel the need.

I urge you to read the Code and resolve to apply its values and principles as each of us have a critical role to play in making this organization a real force for good. Your actions matter, we depend on you.



Gautam Hiranandani | Group Managing Director

## THE CODE – A SUMMARY

### Why The Code Matters

Our purpose, values and our brand promise are central to the way we work. The Code is important because it outlines how we can make sure that the decisions we make are the right ones.

See more details [below](#).

### Act Responsibly And Within Your Authority

We must be disciplined, responsible and take accountability for the risks we take. When you take risks, they must be within your delegated authority and must be appropriate to your business area or activity. Our policies will help you to understand what limits and safeguards are in place.

See more details [below](#).

### Use Good Judgment

We recognise that you may face complex situations which don't have simple, clear-cut solutions. Use the Code's decision-making framework to help you make decisions well, appropriately and with care.

See more details [below](#).

### Speaking Up

You have a responsibility to Speak Up when you see anything that you are not comfortable with at work. This could be poor behaviour, or a process or system that isn't working well. By Speaking Up you are helping the Group to maintain a culture of strong ethics, integrity and transparency.

See more details [below](#).

### Comply With Laws, Regulations And Group Standards

We must comply with laws, regulations and our Group standards, as well as the spirit in which they are intended. Each of us has a personal responsibility to do this.

See more details [below](#).

### **Reject Bribery And Corruption**

Bribery is illegal, dishonest and damages the communities where it takes place. You must not give or accept bribes nor take part in any form of corruption.

See more details [below](#).

### **Ensure Fair Outcomes For Clients**

We must build and foster long-term relationships. This helps us to serve our clients better, improves and upholds our reputation, and is good for business.

We must always make sure that our products and services:

- Are well-designed.
- Are clearly sold based on suitable advice.
- Perform as expected.
- Give clients choice.

See more details [below](#).

### **Manage Conflicts Of Interest**

It is important not to put yourself into a position where your judgment could be affected. You are responsible for identifying, assessing and managing conflicts of interest that arise in your daily working life. This includes actual conflicts and anything which could be seen as a conflict.

See more details [below](#).

### **Protect Confidential Information**

Building trust is an integral part of all the relationships we have with our clients and our stakeholders. They rely on us to keep information safe. You must not release confidential information unless authorised to do so.

See more details [below](#).



**Compete Fairly In The Market Place**

You must understand and comply with competition laws which affect how you compete both locally and internationally.

See more details [below](#).

**Treat Colleagues Fairly And With Respect**

We pledge to provide a safe working environment which is inclusive and free from discrimination, exploitation, bullying and harassment. You hold the key to maintaining this positive environment, which is a central part of our ultimate success. Treat your colleagues fairly and work together to deliver our brand promise. We are all in this together.

See more details [below](#).

**Be Open And Honest With Regulators – Give Them Your Full Co-Operation**

Our regulators are important stakeholders. We must deal with them responsively, openly and honestly. Co-operate with them and support their important role in upholding the safety and standards of the industry and the country they represent.

See more details [below](#).

**Respect Our Communities And The Environment**

The communities where we operate are extremely important to our business. Make sure we help them to thrive by contributing to economic stability in our markets, reducing our effect on the environment, and giving back to our communities wherever we can.

See more details [below](#).

**Use Of The Firm's Assets**

Everyone who works for MCE shares responsibility for protecting the Firm's assets. The Firm's assets include data, software, intellectual property, equipment, supplies, credit cards, communication resources, information networks, documents, knowledge and any other resources or property of the Firm.

See more details [below](#).

## WHY THE CODE MATTERS

### Why Is It Important?

The Code outlines what is expected from everyone, in terms of our behaviour and our actions. By committing to the Code, you are supporting Our Vision, Our Mission, and Our Values - Our Brand Promise.

Our Vision is our goal:

In the next 5 years we want to

- Be a reliable and distinctive provider of engineered solutions for marine operations in the maritime and energy sectors and to grow our revenues to USD 40 million by 2028.
- Build a firm that attracts, develops, excites and retains exceptional people.

Our Mission is our purpose, it is why we are here:

- To provide professional and smart engineered solutions for complex marine operations

Our Values are our beliefs and our principles that bring us together as a team, working toward a common business goal; they help us deliver the best of MCE.

- **INTEGRITY:** Observe high ethical standards, preserve client confidences, maintain an independent perspective, and manage client and firm resources cost effectively.
- **SAFETY:** Success starts with keeping all our employees safe. Our personnel will be well trained and empowered to speak up about risks and concerns. Every accident is avoidable and every employee much hold that belief.
- **SUSTAINABILITY:** To be competitive and thrive in the world of tomorrow. We will have a clear understanding of all our business processes to ensure high quality in all we do.

You bring our brand to life; through the *values* you demonstrate every day.

### Creating The Right Environment

To support the Code, we must create the right environment. We do this through recruitment and training which includes our cultural ethos and approach toward conduct. We must all fully understand our role, responsibilities and the processes that we own.

When decisions on performance are made, they're based not just on 'what' people have achieved, but also 'how' they have achieved it. Having the right attitude and role modelling the behaviours we aspire to deliver every day are a key part of this. We have designed our compensation and professional advancement programmes to reward staff integrity and ethical behaviour, as well as long-term performance.

You must become familiar with the Code and all policies and procedures that apply to your role. You must keep the *values* in the forefront of your mind at all times. We can only fulfil our brand promise if all of our people and colleagues demonstrate good conduct at all times.

Inappropriate behaviour, whether it relates to how you conduct business or your own conduct, can lead to devastating outcomes for our people and colleagues, clients, investors and the markets in which we operate, and can damage our reputation. Play your part in protecting us and think carefully and critically whenever you make decisions to make sure you are upholding the Code.

Always remember that opportunities to generate revenue do not take priority over the need to uphold good conduct and protect our reputation and our brand.

### **What Does This Mean For Me?**

#### **Your Role**

All of us have a personal responsibility to understand how we can contribute to delivering our brand promise. By following the Code, our commitment to good conduct, you will be supporting our compliance and conduct culture. It is important that you understand, just following the rules is not enough. We must all commit to acting with integrity in everything we do.

#### **You must:**

- Act as a role model by behaving responsibly, fairly, and with integrity, and demonstrate exemplary conduct.
- Take personal responsibility for dealing with conduct issues and ineffective processes.
- Identify and follow the policies and procedures relevant to your role. Comply with the spirit and letter of laws and regulations. Make sure you ask questions if you are unsure.
- Raise any concerns you may have over conduct issues and behaviour or inappropriate actions or decisions.
- Make sound judgments when dealing with situations where you are unclear on what to do (use the decision-making framework in the Code to help you)

- Make sure that you understand and comply with the requirements outlined in this Code and recommit to it every year.
- Complete all compulsory training needed to support your understanding of your role and the Code's requirements.
- Speak Up when you see any behaviour, processes or systems which you do not feel comfortable with at work, particularly if you suspect or know of any actual or potential misconduct that breaks or may break any laws, regulations, Group policy or the Code.
- Fully co-operate with any inquiry, review or investigation. This includes keeping to instructions from Legal or Compliance for preserving legal privilege or the preservation of documents and information.
- Deliver on our commitment to good conduct in your actions every day.

### **Your Role As A Manager**

As well as the above, managers are trusted to set the right tone for their teams by creating an open environment and providing clear, effective supervision.

As a manager, you are responsible for embedding effective conduct management practices and playing an essential role in driving an ethical culture. You are also responsible for:

- Taking steps to identify ongoing conduct-related risks within your business area or function.
- Encouraging and supporting your teams to be responsible for conduct
- Considering the implications on conduct of any decisions you make
- Assessing if there are activities that could undermine efforts to improve conduct.
- Making sure that conduct management information is assessed and acted on

People managers are also personally accountable and responsible for:

- Understanding the conduct-related risks in their business and making sure they are managed.
- Supervising their teams and third parties effectively to make sure that they are following relevant policies and procedures.
- Clearly communicating expectations, setting the right tone and guiding their teams' understanding of their own responsibilities in relation to conduct
- Aligning strategic decisions with delivering fair outcomes and helping their teams to use good judgment and make balanced and informed decisions.
- Treating people equally, consistently and fairly, whatever their seniority in line with our fair accountability principles when dealing with conduct issues
- Learning and applying lessons from past events

- Promoting the Code, Speaking Up and our values, and guiding colleagues to do the right thing.
- Making sure their teams understand and commit to the Code every year.
- Making sure their teams complete compulsory training in a timely way
- Including conduct-related behaviour in decisions on managing performance and reward
- Using due skill, care and diligence when carrying out their responsibilities, including identifying and managing issues to do with keeping to the Code.

### **Disclose Certain Things About Yourself**

As part of our commitment to good conduct, you are responsible for disclosing to the Group, potential personal or business conflicts and regulatory restrictions which may have an effect, whether real or perceived, on your role.

### **Who Must Follow The Code?**

All of us; everyone who works at MCE Group is bound by the Code, whether you are full-time, fixed term, a director, a contractor, a subcontractor, a secondee, a temporary employee or a voluntary worker, working in any of the Group Companies and in any capacity.

### **Failure to follow the Code.**

When questions arise around a failure to work within the boundaries of the Code, rest assured that any investigations or decisions on staff disciplinary matters are governed by our strong principles on fair accountability.

We will treat failure to follow the Code very seriously and it may lead to disciplinary action which could result in dismissal. This process may involve other authorities if you have broken any laws or regulations, including the police if you have committed a criminal offence.

### **Other Group Codes**

The Code is the overarching document from which other business codes are created. These business codes provide more detailed and specific requirements. If these other codes apply to your role, you must also follow them.

### **Regulatory Codes**

You may also be covered by other requirements set by governments or regulators through regulatory codes of conduct and their rules. You must follow these codes. If the regulatory codes

and this Code give different standards for a particular requirement, you must comply with whichever is the more stringent standard, making sure that you satisfy the obligations set by all relevant codes.

### **Code Oversight**

The Board of Marine Consultants & Engineers Pte. Ltd. oversees the Code.

### **More Information And Practical Guidance**

The Code sets out minimum standards of behaviour that we expect all of our people to follow. It works alongside our policies and procedures. You are responsible for keeping to our requirements. We expect you to gain a deep understanding of this Code and what you need to do, and to comply with all relevant policies and procedures that apply to you.

If you have any questions, all you have to do is ask. You can speak to your Line manager, Regional Management Team, Group Directors or other relevant colleagues.

### ***Remember:***

*This Code outlines what we expect of you. The resources provide practical information about how to follow the principles and rules outlined in the Code.*

**ACT RESPONSIBLY AND WITHIN YOUR AUTHORITY**

See the summary [above](#).

We create value for clients and produce long-term returns for shareholders by taking and managing risks in line with our terms and conditions of business, industry codes / standards and best practises. Because of this, all of our people must make sure they manage risks effectively.

It is important that every aspect of our business is carried out within a framework of delegated authority that flows down from the Board of Marine Consultants & Engineers Pte. Ltd. or the board of the relevant Group entity under which you work. Delegated authority is designed to protect you as well as us. Understanding which limits and policies apply to you means you are not put in a position where you are unaware of the risks for which you are responsible, and do not take more risks than appropriate for your role or seniority.

**What Does This Mean For Me?**

You must keep within our limits and policies and not make decisions which are beyond your authority.

**You Must:**

- Understand the limits and policies that apply to you and keep to them.
- Make sure you have appropriate authority before committing us to any contractual commitment.
- Be disciplined and take responsibility and accountability for the risks you take.
- Before you take risks, make sure they are appropriate to your business or activity.
- Make sure that decisions you make do not create reputational risk.
- Exercise strong financial control by acting within your financial authority and ensuring accurate record keeping.

**As A Manager, You Must:**

- Understand the business you are responsible for
- Take ownership and accountability when discharging your responsibility, by appropriately overseeing any delegations of authority and supervising your team and third-party providers.

**Remember:**

*It is important that you understand how the framework of delegated authority applies to you. You must oversee the risks that fall under your authority and make sure you do not take risks that are inappropriate for your role.*



## USE GOOD JUDGMENT

See the summary [above](#).

### Why Is This Important?

Every day is different, so the Code, our policies and procedures give you detailed requirements to follow as you go about your daily activities. However, these resources do not cover everything – you may face situations which are challenging and unfamiliar. We trust you to use your good judgment in these situations, although you must remember to stay within your delegated authority.

### What Does This Mean For Me?

Being methodical and informed when considering solutions will help to deliver a positive outcome. Acting hastily, without involving your manager and any other relevant colleagues, exposes you to poor decision-making. We recognise that some situations may feel difficult. We have put together a simple decision-making framework to guide you. This framework is here to help protect both you and us.

QUESTION	WHAT TO CONSIDER
Is my decision in line with the Code?	<ul style="list-style-type: none"> <li>• Does the Code deal with this issue directly?</li> <li>• Is my decision consistent with the values and the brand?</li> <li>• Could my decision create any form of reputational risk?</li> </ul>
Have I consulted others and asked for information to help me make an informed decision?	<ul style="list-style-type: none"> <li>• Do I need to involve others, including my manager or other relevant colleagues?</li> <li>• Is this an informed decision? Is there more I need to know?</li> </ul>
Is this decision within my authority?	<ul style="list-style-type: none"> <li>• Am I able to make this decision on behalf of the Group?</li> <li>• Do I need to pass this issue to those who are authorised?</li> </ul>

QUESTION	WHAT TO CONSIDER
<p>Would I be comfortable if the situation was written about in the press or shared in the local community?</p>	<ul style="list-style-type: none"> <li>• What are the consequences of this decision or situation? How would this play out if it were publicly known?</li> <li>• Will I take personal ownership for these outcomes?</li> <li>• Is there any aspect of my decision making that could pose a reputational risk for the Group?</li> </ul>
<p>Is this the right thing to do?</p>	<ul style="list-style-type: none"> <li>• Am I confident that my action is permitted by the spirit and the letter of the law, and by the relevant regulator?</li> <li>• Have I taken all the necessary steps to make sure my decisions will create fair outcomes for all involved?</li> </ul>

Acting hastily, without involving your manager and any other relevant colleagues, exposes you to poor decision-making and negative consequences.

**SPEAKING UP**

See the summary [above](#).

**Why Is This Important?**

We have a critical role to play in safeguarding our stakeholders, so we must maintain a culture of strong ethics, integrity, transparency and openness. By Speaking Up you help us to identify issues and deal with them.

**What Does This Mean For Me?****When should I Speak Up?**

Speaking Up is a safe, confidential way to let us know if you see anything that doesn't feel right. Some examples of when you should speak up include if you see anyone:

- Failing to comply with laws or legal obligations, including committing fraud or other criminal acts.
- Putting the health and safety of a person in danger
- Damaging the environment
- Breaching rules or regulatory requirements
- Failing to comply with codes of conduct, Group, business or country policies and procedures.
- Doing anything which has or is likely to have a negative effect on our reputation or financial well-being.
- Deliberately concealing any of the above

You do not need to be certain of any of these situations to Speak Up. It is enough to have a reasonable belief that any of the above situations has taken place, is taking place, or could take place. However, when you Speak Up you must do so honestly and in good faith.

**What is Speak Up not used for?**

If you have a general employment related concern that affects you personally or is about how you are being treated, Speak Up is not the best channel to help you. In the case of these concerns, please speak to your line manager or Human Resources.

**What Do I Do If I Suspect Misconduct?**

Speak to or send a secure confidential email someone in your management chain (this may or may not be your line manager), your Regional Management Team or the Group Managing Director.

Alternately, you can also choose to report the misconduct anonymously. However, by providing your contact details we will be better able to follow up on your report, get more information and keep you informed. If you do raise your concern anonymously, please make sure you give enough information so it can be investigated.

**No Victimisation**

We do not tolerate the victimisation of staff who Speak Up, even if the report turns out not to be proven.

Victimisation is not allowed for any reason and is illegal in some markets. We will take disciplinary action against anyone who victimises those who Speak Up.

**Confidentiality**

We will treat your identity (if you have given your details) and report in confidence. Information relating to your identity and report will only be passed to others on a strict 'need to know' basis.

**Your role as manager**

As a manager, it is your responsibility to create and foster an environment where colleagues can feel confident about raising their concerns, without fear of victimisation. You should familiarise yourself with our Speaking Up materials including the Speaking Up fact sheet to help you to do this.

**Remember:**

*We will take action about actual, planned or potential misconduct. If you have a concern about misconduct, you have a responsibility to Speak Up and help us to stamp out negative conduct.*

*Our Speak Up channels are available to all of us, and also to people from outside the organisation.*

*to raise their concerns if they suspect misconduct.*



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**COMPLY WITH LAWS, REGULATIONS AND GROUP STANDARDS**

See the summary [above](#).

**Why Is This Important?**

It is vital that we comply with relevant laws, regulations and Group standards in everything we do. Making sure that the Group operates within these laws, regulations and standards is the personal responsibility of every one of us.

**What Does This Mean For Me?**

Our Group standards, and the laws and regulations which apply in each state or country in which we operate, give us a framework of rules within which we must function.

**You must:**

- Act ethically, honestly, professionally and with integrity at all times
- Comply with all relevant legal and regulatory requirements. Make sure you know and understand them, and act in a way which follows their instructions and the spirit in which these rules are intended. If you fail to do so, the consequences can be severe, including damage to our brand, loss of clients, loss of confidence from our regulators and the public, suspension or withdrawal of the licences we hold and fines or other penalties.
- Comply with Group standards. You must do this unless local laws or regulations are either stricter than, or do not allow our standards – in which case local laws or regulations apply.
- Some countries have requirements for people, organisations or particular activities to be licensed, registered, or certified. These are regulatory requirements, and we must comply with them. It is your responsibility to make sure you have the relevant licences, registrations and certificates that you and your team need.
- Understand the legal and regulatory requirements involved in cross-border activities and keep to these requirements.

**Remember:**

*It is your responsibility to know the rules and abide by the laws, regulations and Group standards which govern us. Simply following the letter of the law is not enough, we must always act in a way which also embraces the spirit in which these rules are intended. Factors such as the political environment and the public's view of our actions can affect the way in which we interpret laws and regulations. If in doubt, ask you line manager or regional management team.*

**REJECT BRIBERY AND CORRUPTION**

See the summary [above](#).

**Why Is This Important?**

There is no room in this organisation for acts of bribery or corruption. Bribery and corruption are illegal, dishonest and extremely damaging to the countries and communities where they take place. We must actively reject bribery and corruption in all its forms.

**What does this mean for me?**

When someone gives a benefit to someone else in order to influence that person's behaviour, that is a bribe. When someone takes improper advantage of their position to make a gain for themselves, they are acting corruptly.

You must not give or accept bribes or take part in, or enable, any forms of corruption. And you must go further than this, to make sure that your actions do not create the perception of bribery or corruption.

Bribery and corruption can take many forms - through procurement decisions, expenses, gifts and entertainment, hiring decisions, sponsorships, donations, the actions of our customers and so on. You must take the time to consider how your day-to-day business activities might encounter or create the risk of bribery and corruption.

If you genuinely feel that your personal safety might be at risk if you do not take part in bribery or a corrupt arrangement, you must report it to your regional management team. You should also report the incident to the relevant authorities, where appropriate.

You must follow the guidance set out in our [ANTI BRIBERY & ANTI CORRUPTION STANDARD](#) and other policies which may govern bribery and corruption risk for specific activities. When you make decisions to deal with any bribery and corruption risk you must make sure these are properly and honestly documented.

**Remember:**

*We will not tolerate bribery or corruption in any form. You will not be disadvantaged for refusing to commit bribery, even if this results in a loss of revenue or increased costs for the Group. Be vigilant and take great care when dealing with third parties.*

**ENSURE FAIR OUTCOMES FOR CLIENTS**

See the summary [above](#).

**Why Is This Important?**

We must always do our very best to deliver fair outcomes for clients. It is important we value our independence in making decisions to provide our clients with the best possible solution. Our clients are at the heart of everything that we do, and we are committed to providing clear and honest advice to them, and to making sure that the products we offer are right for them. As well as being the right thing to do, providing fair outcomes for clients helps us to build and foster long-term relationships with them. Many a time you may be a client of the Group yourself – think about how you would like to be treated.

**What Does This Mean For Me?**

You must keep to the following minimum standards when dealing with all clients:

- Make sure that products and services are designed with our clients' needs in mind, including fair and reasonable pricing which has been clearly disclosed.
- Make sure all communications with clients are fair and not misleading.
- Handle complaints in a friendly, fast, fair and effective way. Keep to all procedures for handling complaints and use client feedback to identify the root causes of issues. If we have all the facts and can identify a root cause, we will be able to improve our products and services and create better outcomes for clients.

**Remember:**

*It is the duty and responsibility of every one of us to make sure that we provide fair outcomes for clients and pay attention to their interests in all of our dealings with them.*



## MANAGE CONFLICTS OF INTEREST

See the summary [above](#).

### Why Is This Important?

Managing conflicts of interest effectively allows us to act fairly, avoid legal and regulatory risks, protect our brand, reputation, and our own personal integrity.

Conflicts of interest fall into two broad categories - business and personal. You have a responsibility to identify and report any business or personal conflicts of interest.

**Business conflicts of interest** can arise in the following situations:

- Between the Group and its clients, suppliers or other third parties.
- Between different businesses within the Group, particularly between 1st party and 3rd party business lines, e.g., Design and Warranty, will occur. In these cases, the Regional Management team shall:
  - Ensure that clients are informed in writing and are agreeable, making the arrangement fully transparent.
  - Ensure both activities are performed by two totally independent project teams.
  - Ensure mechanisms are in place to monitor and prevent distortion and biases of actions and/or decisions.

**Personal conflicts of interest** may arise when you put your personal interests ahead of those of a client, supplier, other third party or the Group. They may also arise where you have close personal relationships or close financial relationships with other colleagues.

### What does this mean for me?

#### You Must:

- Avoid any situation where you improperly benefit, or appear to improperly benefit, from the Firm's business decisions or knowledge acquired at MCE.
- Get approval before you take part in outside business interests and close personal or financial relationships.
- Make sure that you are familiar with the Group Conflicts of Interest Policy and Procedures and comply with the conditions in them.

## PROTECT CONFIDENTIAL INFORMATION

See the summary [above](#).

### Why Is This Important?

As part of the services we provide, we receive confidential information which may be about organisations, projects, markets and us, as well as personal data of clients, colleagues, and other individuals. It is critical that how we use confidential information, including personal data, instils trust and confidence, not only in those directly affected, but in the broader community in which we operate. We are committed to handling confidential information, including personal data, respectfully and appropriately in line with our responsibilities in terms of Non-Disclosure / Confidentiality Agreements, as well as privacy law.

### What Does This Mean For Me?

All information and personal data you gather through your employment and dealings with us is confidential unless clearly said to be otherwise. This includes information and personal data on clients, colleagues, other organisations and the Group. This obligation will apply even after you have left the Group.

You must make sure that you only share confidential information on our internal platforms such as email, with those allowed to receive it. Confidential information, including personal data, must only be used to carry out your work, in line with all laws, regulations, contracts and Group policies and procedures which apply, including relating to information security and information walls.

You must use skill, care and diligence in securing and handling confidential information, including personal data. This includes:

- Not accessing any confidential information, including personal data, unless you are authorised to do so in line with your role.
- Accessing, storing and getting rid of confidential information, in line with our security policies
- Protecting and handling personal data to meet privacy requirements.
- Transferring it securely to others or within the Group
- Not viewing it in public
- Respecting information walls that may apply to it.
- Not using or disclosing confidential information, including personal data, on any social networking sites you may use.



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- Being vigilant for any signs of cyber threats, including phishing emails and other social engineering practices

If you suspect that confidential information, including personal data, is lost or stolen, you must report it immediately to your manager, Compliance, through the Group or country incident-reporting process or the Speaking Up programme.

## COMPETE FAIRLY IN THE MARKET PLACE

See the summary [above](#).

### Why is this important?

MCE does not engage in anti-competitive activities. We compete for business vigorously and seek to outperform our competition fairly and honestly complying with all applicable antitrust and competition laws.

We seek competitive advantages through superior performance, never through unethical or illegal business practices.

Competition laws are in place to ensure fair competition in the marketplace for products and services. They generally prohibit agreements that tend to restrict competition, such as agreements between competitors regarding pricing, bidding, production, supply and customer practices, as well as a variety of other forms of unfair conduct.

The most common examples of not competing fairly in the marketplace are (this is not a full list):

- Dividing and sharing markets - agreeing with a competitor not to go after a customer,
- Deciding which territories each business will take.
- Bid-rigging and discussing tenders - agreeing with another business or competitor how much you will bid for a certain product or service,
- Price-fixing - agreeing with a competitor what price you will charge for a certain product or service to avoid competing with each other.
- Failing to keep to proper standards of market conduct.

Seek advice from your line manager before discussing prices, customers, suppliers, marketing or service intentions with anyone outside MCE, in particular, any competitors.

### What Does This Mean For Me?

This section of the Code is particularly relevant to you if you negotiate agreements on our behalf, contract with clients or others on our behalf, or come into any sort of contact with our competitors. You must understand the laws which affect how we compete in both local markets and across borders.



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**Remember:**

*You have a responsibility to keep to proper standards of market conduct, understand how competition risk applies to your role, and raise possible issues with your line manager or regional management team as soon as you become aware of them.*

## TREAT COLLEAGUES FAIRLY AND WITH RESPECT

See the summary [above](#).

### Why Is This Important?

At MCE we believe it is important that everyone can work in a fair, safe, inclusive and enjoyable place that encourages creativity, collaboration and continuous improvement.

Trust and fairness are also a central part of our approach to managing and developing people. By building on the strengths and abilities of our employees, we can help them to achieve their full potential. And if we work better as a team, we will be able to better serve our clients.

### What Does This Mean For Me?

We expect you to treat your colleagues fairly and with respect. We are all entitled to a safe working environment that is free from discrimination, exploitation, bullying, harassment or inappropriate language.

Particular areas to take account of are shown below:

- We value diversity and work together as a team. We are committed to providing equal opportunities and fair treatment in employment. We do not accept unlawful discrimination in our recruitment and employment. We appoint, train, develop, reward and promote based on merit and ability.
- We may take action to deal with disadvantage or under-representation among specific groups, with the aim of making sure our employment decisions are free from bias.
- We do not tolerate any exploitation or any bullying, harassment, discrimination against, or victimisation of our colleagues, clients, or visitors. We all have a duty to treat the people we encounter through work with dignity and respect.
- When using our tools and systems such as Outlook, Teams Chat and others we must make sure that our communications are appropriate. You should make sure that all communications are factual and do not contain offensive or abusive language.

We are committed to dealing with any issues that are brought to our attention. We will thoroughly investigate complaints of harassment, exploitation, discrimination or victimisation and take formal disciplinary action where misconduct has taken place.



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**Remember:**

*We are all entitled to a safe and pleasant working environment and all of us have a responsibility to treat our colleagues fairly, with respect, and without discrimination.*

**BE OPEN AND HONEST WITH REGULATORS – GIVE THEM YOUR FULL CO-OPERATION**

See the summary [above](#).

**Why Is This Important?**

To serve our clients and continue to operate we must maintain strong and effective relationships with regulators and governments. If we fail to meet our commitments, our regulators may lose confidence in us and take action against us.

**What does this mean for me?**

When approached by or when approaching Regulators or Government Officials, you must interact with them in a responsive, open, honest and co-operative way, and freely give them information that they would reasonably expect.

**You Must:**

- Immediately refer enquiries you have received from regulators to your regional management team and not discuss the enquiry with the regulator unless you have been authorised to do so.
- Contact your Country Head if you have any questions about how to respond to a regulatory enquiry or relationship.
- Never mislead regulators or cover up a problem.

If you are responsible for communicating with regulators, you must:

- Be open and honest in your dealings with them.
- Take an active role in communicating with regulators. Make sure you understand their expectations and can anticipate risks and opportunities - be proactive.
- Keep them well informed about our activities so there are no assumptions or surprises.
- Prepare thoroughly for meetings with regulators and for regulatory inspections.
- Keep to rules, regulations and other regulatory expectations in all of your day-to-day dealings by upholding them in a conscientious way.
- Give the regulator full and accurate information as soon as you can.

**Remember:**

*If you have contact with regulators, you should make sure your dealings are responsive, open and co-operative.*



**RESPECT OUR COMMUNITIES AND THE ENVIRONMENT**

See the summary [above](#).

**Why Is This Important?**

We all have the ability and responsibility to make positive change in our communities. We want to make sure that the products and services we provide supports sustainable economic and social development in the communities in which we operate.

Our Sustainability Aspirations highlight how we can contribute to sustainable development through our day-to-day roles in the Group.

We have a duty to respect the human rights of others who may be affected by our actions and decisions.

We have robust targets in place to manage our energy, paper and water usage. Our commitment to meeting these targets means we are managing our resources responsibly.

We are strictly non-political. We do not get involved in political activities, support political parties or have any political links.

**What Does This Mean For Me?**

You must understand and uphold our community and environmental commitments. These include:

- Using the Sustainability Aspirations to help you identify opportunities to make a positive contribution to our communities and the environment.
- Being aware of how the day-to-day decisions you make might affect the human rights of others and acting within our policies to avoid negative outcomes.
- Sharing your skills with local communities through employee volunteering
- Keeping to our policies on political activities, including the Group Sponsorship and Donations Policy

**Remember:**

*We each have the ability and responsibility to make positive change in our communities. It is our responsibility, as well as our privilege, to make a difference.*

**USE OF THE FIRM'S ASSETS**

See the summary [above](#).

Everyone who works for MCE Group shares the responsibility for protecting the Firm's assets. The firm's assets include data, software, intellectual property, equipment, supplies, credit cards, communication resources, information networks, documents, knowledge and any other resources or property of the Firm.

**You Must:**

- Ensure the care, management and cost-effective use of the Firm's property.
- This includes protecting it from waste, theft, misuse, damage, loss or misappropriation.
- Maintain, reasonably protect and ensure you can account for all firm's property assigned to you.
- Dispose of property in accordance with the Firm's guidelines regarding the disposal of surplus assets and the deletion of MCE Group information from those assets

**Using Internet And Email:**

The Firm provides e-mail and internet to employees and contract staff to conduct business, promote work-related research and enhance internal and external communication.

The internet is an uncontrolled environment. The Firm's e-mail carries information that identifies you and the Firm. It is your responsibility to take reasonable care to protect the Firm's systems, reputation and information.

Never use MCE Group hardware to

- Download any illegal or unauthorized software (including music, movies, videos or programs).
- Participate in non-work-related financial transactions, share trading, internet media social sites, games, gambling.
- Access sites carrying sexual content, or that which may be reasonably viewed as socially or politically offensive.

Ensure your email communication is appropriate and polite.

Limited personal use of MCE Group communication resources is permitted for purposes that are lawful, ethical and consistent with the Code, as long as the use does not interfere with work obligations.

Unless prohibited by law, we reserve the right to access and disclose all information contained on our computers, USB flash drives, portable hard drives or wireless devices including mobile phones, tablets, etc. at any time for any reason.