

BUSINESS ETHICS **POLICY STATEMENT**

As CEO of D2 Rail & Civils Ltd I believe in running and developing the business in a sustainable way, for the benefit of those who work in it. I believe that our business interests are best served by behaving responsibly towards all our stakeholders; clients, staff, suppliers and the communities in which we operate.

I believe that as a company we have a responsibility to adhere to the highest standards of behaviour and care. As a business, we recognise that laws vary from country to country. Compliance with those laws is necessary, but never sufficient.

D2 Rail & Civils Ethical Business Policy therefore sets out the universal standards of individual and collective behaviour that we seek to apply to all of our activities worldwide.


The general principles which underpin this policy align with our corporate values; we are passionate, committed, expert, responsible and supportive. Therefore, we will: -

- Treat staff fairly and with respect for their dignity.
- Deal with clients with integrity, offering good value, high quality advice and prompt redress if something goes wrong.
- Embrace the aspirations of our clients and the design team, making positive, enthusiastic and timely contributions and deploying the best available expertise in the design process.
- Conduct our relationships with suppliers with honesty, fairness, and mutual trust.
- Be fair and honest in our dealings with contractors, select them objectively and administer their contracts judiciously.
- Always specify products for projects rationally, acting solely in the client's interest, in a way that is auditable.
- Comply fully with our legal obligations and aim to make a positive contribution to the sustainable development of the communities in which we work.
- Monitor ethical performance and produce regular reports giving a true and fair view of our affairs.

This policy aims to outline *how* D2 Rail & Civils does business. I recognise that it would be impossible to produce a comprehensive set of rules that cover every situation that our people might encounter in the course of their work. Instead, this policy seeks to provide the framework within which we expect our people to operate, and some guidelines as to what may or may not be acceptable.

Where a particular activity is clearly at odds with our ethics as an organisation and is deemed to be unacceptable in any circumstances, this is made clear in this policy. As a general rule, I expect people to make sensible and informed judgements about whether a particular activity, approach or way of working is ethical and likely to be acceptable to the company, and to seek guidance from other employees within the company as required where they are unsure.

This policy will be reviewed at least annually for its effectiveness and compliance will be monitored through regular inspections and audits.

A handwritten signature in black ink that reads 'D. Diebegen'.

Signed
CEO

Date: 16th January 2023