

Our Code

Delivering with PRIDE



Being our best — a message from our Executive Chair

1. Delivering with PRIDE

- [Why we have Our Code](#)
- [How Our Code makes us unique](#)
- [Our Code and PRIDE values](#)
- [How Our Code applies](#)
- [Our individual responsibilities](#)
- [Additional expectations of leaders and managers](#)
- [Making good decisions](#)
- [Using your voice: how to Speak Up](#)

2. Respecting our people

- [Creating a respectful work environment](#)
- [Acting inclusively and embracing equality and diversity](#)
- [Operating safely](#)
- [Valuing health and well-being](#)

3. Conducting our business with integrity

- [Preventing bribery and corruption](#)
- [Exchanging gifts and hospitality](#)
- [Managing conflicts of interest](#)
- [Competing fairly](#)
- [Respecting international trade and export controls](#)
- [Treating our clients, suppliers, and partners fairly](#)

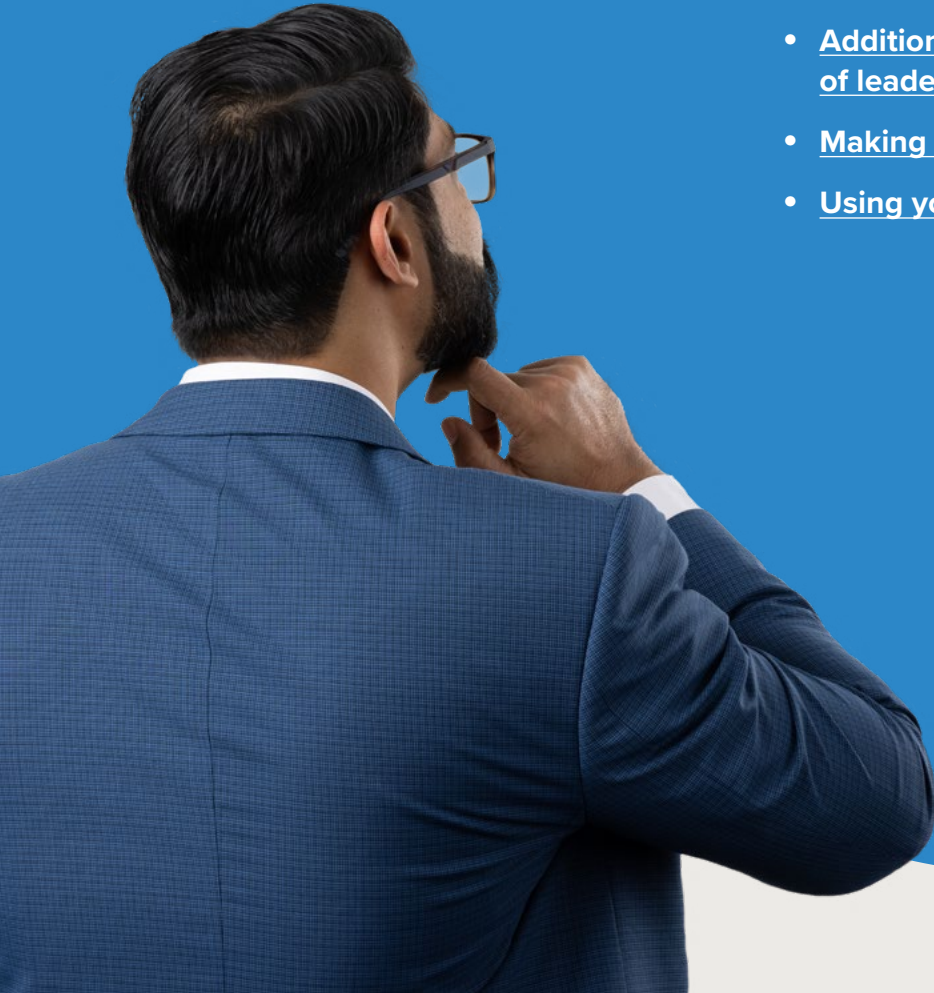
4. Protecting our assets and reputation

- [Protecting our intellectual property](#)
- [Securing information](#)
- [Protecting our systems and assets](#)
- [Respecting privacy and data protection](#)
- [Engaging responsibly in political activity](#)
- [Responsible public communications](#)

5. Delivering value to society

- [Delivering social outcomes](#)
- [Engaging with our communities](#)
- [Advancing sustainability](#)
- [Respecting human rights](#)

Contents



Being our best

Our Code brings together all that makes Mott MacDonald unique. Building on our purpose, which explains why we're here, Our Code provides a framework for living our PRIDE values.



Whether we face an everyday dilemma or something more serious, as individuals or as a business, Our Code is here to help us make good decisions and do what's right. By setting out our commitment to acting with integrity and our expectations of all colleagues and those we work with, Our Code challenges us to work with each other, our partners, clients and communities in a way that builds trust and mutual respect.

I am proud to work for Mott MacDonald because I already feel this trust and mutual respect throughout our business. By following Our Code and delivering on these expectations we will foster a culture that is friendly and supportive, open and fair. This will protect and enhance the good name of Mott MacDonald, support our continued success to win and deliver better projects, and ensure Mott MacDonald remains a company we can all be proud of.

We all have a responsibility to uphold Our Code. If you

see or hear anything that undermines Our Code or puts our reputation at risk, have the courage to Speak Up, even if you are not directly affected. By speaking up, you give us the opportunity to be our best and deliver with PRIDE – for the benefit of everyone we work with. All concerns raised will be considered seriously.

Please take time to familiarise yourself with Our Code, speak about it with your colleagues and come back to it whenever you need further guidance.

James Harris
Executive chair,
Mott MacDonald Group

1 | Delivering with PRIDE



Our Code consolidates our commitment to doing what's right and building an ethical culture throughout Mott MacDonald.

It sets out our standards and expectations on the issues that matter to us; it's a guide for making good choices and living our PRIDE values.

By following Our Code, we build stronger, more trusting relationships with our clients, communities, and colleagues and increase our ability to comply with country-specific, federal, and local laws and regulations. We follow local legislation and regulation wherever we work. However, where Our Code provides the higher standard, we expect that to apply. Our Code cannot cover every situation. If in doubt, seek help — there's information about who to talk to on the pledge page of each section.

Why we have Our Code





How our Code makes us unique

Our Code brings together our purpose, our PRIDE values, our proposition, and our people promise.

Our purpose is to improve society by considering social outcomes in everything we do, relentlessly focusing on excellence and digital innovation, transforming our clients' businesses, our communities, and employee opportunities. It sets out why we're here, what makes us special to our clients, and how we're different from our competitors.

Our Code is about doing things right.

Our PRIDE values are what we stand for: progress, respect, integrity, drive, and excellence.

Our proposition summarizes how we do what we do — opening opportunities with connected thinking.

And **our people promise** explains how we're making the company we love.

Together, these provide a framework for how we achieve and sustain success as a responsible business.

Progress
P

We drive change and use it to create opportunity.
We aim to make a lasting positive difference for present and future generations.
We actively develop ourselves as individuals and professionals.

Respect
R

We always care about the human and environmental impact of what we do.
We value all peoples and cultures, and promote equality, diversity, and inclusion.
We treat everyone with respect.

Integrity
I

We deliver on our promises.
We behave ethically and do not tolerate bribery or corruption.
We uphold safety, security, and well-being as a fundamental right of all.

Drive
D

We constantly stretch our thinking to find extra value for our clients and their end-users.
We work as one Mott MacDonald, connecting all our skills to create the best outcomes.
We stay focused and persevere to achieve our goals.

Excellence
E

We act on our belief that there is always a better way.
We use our restless curiosity and leading-edge skills to challenge and innovate.
We connect our people and experience to turn opportunity into the best outcomes for all.

Our Code and PRIDE values

Our Code and PRIDE values guide our behavior and how we act every day. Together they shape our culture and inform our relationships with our clients, partners, and each other. Our PRIDE values are the platform from which we deliver social outcomes, and they underpin our unique employee-ownership model.



How Our Code applies

It does not matter where you work or what you do for Mott MacDonald, Our Code applies to everyone: all employees, regardless of grade or role; all agency staff and consultants; all those working full-time, or part-time, under a permanent or temporary contract. It also applies to all who work in Mott MacDonald-operated joint ventures.

All employees of Mott MacDonald Group companies must agree to uphold Our Code. Suspected breaches will be investigated.

If a breach has occurred it may result in disciplinary action, up to and including dismissal.

Our choice of business partners, clients, and third parties, including joint ventures, affiliated companies, suppliers and subcontractors, can affect our reputation. Therefore, we only want to work with those who operate in a way that is consistent with Our Code and PRIDE values and can meet those standards.

If a business partner or third party fails to do so, we may terminate the relationship.

Individual responsibilities

We are all responsible for our own behavior and have a collective responsibility to do our best for each other, our clients, communities, and society. Each of us must:

- Read and be familiar with the standards and commitments in Our Code.
- Be accountable to the standards of Our Code.
- Make informed decisions based on our PRIDE values, using our decision-making model.
- Speak up when we identify possible breaches of Our Code.
- Participate fully and honestly in any investigation into suspected breaches of Our Code.
- Complete mandatory training and annually certify that we have acted and will continue to act in line with Our Code.

Additional expectations of leaders and managers

Leaders and managers are instrumental in setting expectations and reinforcing standards. They must:

- Be positive role models for Our Code and PRIDE values.
- Create a working environment in which Our Code and PRIDE values are understood and promoted as part of everyday practice.
- Make time to listen to and address concerns raised by team members, protecting them from retaliation if they speak up or help with an investigation.
- Be consistent and fair when holding themselves and others to account on matters covered by Our Code.
- Act courageously to address any shortcomings and not shy away from difficult conversations.
- Encourage colleagues to seek help and advice, including through the Speak Up helpline, if they are unsure what to do or are concerned that the standards of Our Code are not being met.

Making good decisions

We trust our colleagues to make good decisions. However, not every decision is straightforward. There may be instances when the right answer is not clear, and you are unsure how to do the right thing. When in doubt, it is important that you don't feel you need to make these difficult decisions on your own. Taking five minutes to work through the questions in our decision-making model, either on your own or with a manager or colleague, can be helpful in guiding you to the right choice.

Our decision- making model

Is it legal?

Does it comply with
Mott MacDonald policy?

Is it consistent
with Our Code
and PRIDE
values?

Would I be
comfortable
if this appeared
in the news or
on social media?

Would this be
a good way to
operate if we did
things this way
all the time?

Does it help to build
our ethical culture
and the reputation
of Mott MacDonald?

**If you answer no to any of these questions,
or are unsure about your response, you
should stop and seek advice from others.**



Using your voice: how to Speak Up

We recognize that from time to time behavior falls short of expected standards. When this happens, it is important that concerns are raised and dealt with. They must never be ignored. We therefore promote an open, transparent, and safe working environment where you are empowered to speak up and are protected when doing so.

Speaking up means using your voice to ask a question, seek advice, or report a concern about misconduct, malpractice, or suspected breaches of Our Code.

This includes speaking up about any previous concern that may not have been suitably addressed, anywhere in Mott MacDonald.

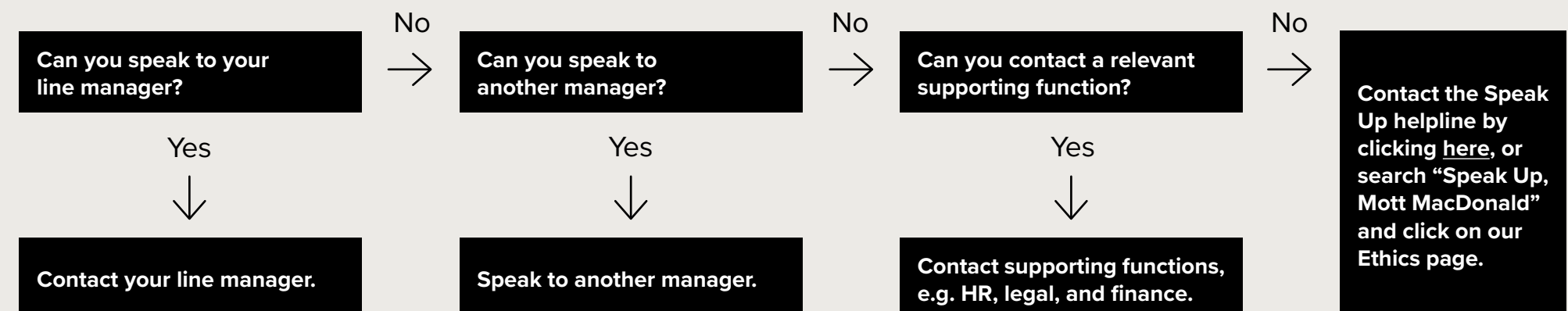
Talking to your line manager will usually be the best course of action. However, if this is not possible, you can speak to another manager, a colleague from a supporting function, such as legal, human resources, or health and safety, or you can contact the Speak Up helpline. You are free to choose whichever you are most comfortable with.

Speak Up helpline

The Speak Up helpline is operated by an independent third party. It allows you to report concerns and ask questions in complete confidence, by Internet or telephone. It is available:

- 24 hours a day, seven days a week, every day of the year
- Free of charge
- From anywhere in the world

Our Speak Up helpline is also available to business partners, including contractors, secondees, agency staff, consultants, suppliers and joint venture partners, and members of the public. Anyone wishing to report a suspected breach of Our Code can use it.





How we respond

We take breaches of Our Code extremely seriously and respond to all concerns raised. Line managers are expected to assess any concerns raised directly with them and to address or escalate as appropriate.

All concerns received through the Speak Up helpline are initially assessed by one of the legal team and where necessary will be investigated by a suitably trained and objective individual.

If a breach of Our Code is found, appropriate steps will be taken to address the issue, which may include disciplinary action, up to and including dismissal.

Confidentiality and anonymity

All concerns raised through the Speak Up helpline are treated confidentially.

Information relating to the concern will only be shared with those who need to know for legitimate business purposes, including investigation, risk management, and remedial or disciplinary actions.

Concerns can be raised anonymously, unless prohibited by local legislation.

Non-retaliation and good faith

We do not tolerate any form of retaliation or discrimination against those who raise concerns or those who investigate them. We expect all involved — the concerned individual, the person or people alleged to have done wrong, or anyone else involved in any other way — to be treated fairly, objectively, and with respect.

We expect concerns to be raised in good faith and do not tolerate knowingly false reporting. False reporting can damage morale, harm our reputation, and undermine our PRIDE values.

Our Code...

Sets out our standards and expectations on the issues that matter to us; it is a guide for making good choices and living our PRIDE values

Is key to how we achieve and sustain success as a responsible business

Together with our PRIDE values helps us all understand what doing things right means at Mott MacDonald

2 | Respecting our people

We commit to respecting
others and working safely.





Our people promise

We're committed to creating an organization where people feel valued.

Each of us will:

- Create a nurturing environment where we can be ourselves, feel valued, safe, and at our best.
- Apply our skills to challenging and worthwhile projects and inspire each other to be the best we can be.
- Be part of a global family of passionate innovators, problem-solvers, doers, and thinkers.
- Make a difference to other people's lives and our planet's future.

Together we will:

- Celebrate our differences and treat everyone fairly and with respect.
- Take ownership for our growth and find the opportunities that are right for us.
- Be generous with our knowledge, work together to solve problems, and take pride in each other's success as much as our own.
- See change, however big or small, as an opportunity to learn and improve.

Creating a respectful work environment

Together, we create a nurturing environment where each of us can be ourselves, feel valued and safe, and enabled to perform at our best. We celebrate our differences and treat everyone fairly and with respect, including those we interact with outside our organization.

Bullying and harassment

Bullying and harassment can take many forms including threatening or distressing language or behaviour, physical or verbal intimidation or discrimination, and sexual harassment. These may be associated with an abuse or misuse of power. None are acceptable.

We value and respect each other. We are committed to providing a work environment where all can contribute, free from the fear of bullying or harassment. All colleagues are expected to be role models, aware of their own behaviour and how this may affect others. Anyone who observes bullying or harassment must report and take steps to prevent it.



We treat any allegations of bullying and harassment seriously and ensure we implement our policies and procedures impartially, swiftly and fairly.

Safeguarding

We are committed to safeguarding children, young people and adults at risk of harm.

We have a collective responsibility to prevent abuse and exploitation, and we apply appropriate measures to safeguard those in need of protection, within and outside our organisation. We have a zero-tolerance approach to safeguarding misconduct.

We comply with the laws of the countries we work in and adhere to Our Code where that provides the higher standard. We report any potentially criminal behaviour to the police and/or other relevant authorities including the client, where appropriate.

Any inappropriate behaviour or safeguarding concerns must be reported to a safeguarding lead, via safeguarding@mottmac.com, to a manager or through the Speak Up helpline. We seek to take swift action to support and protect vulnerable people where concerns arise regarding possible abuse or exploitation. All concerns are investigated confidentially using the Speak Up process.

Acting inclusively and embracing equality and diversity

Ensuring that we have a diverse workforce, whose talents are harnessed through inclusive cultures and behaviors, is one of the ways we live and breathe our purpose every day. We commit to creating equitable, accessible, and inclusive working environments where trust, respect, and psychological safety are the norm. We do not tolerate any form of discrimination, including where characteristics are protected by law, which may include:

- Age
- Caring responsibilities
- Caste
- Class/social mobility
- Colour
- Disability
- Gender identity
- Marital status
- Neurodiversity
- Nationality
- Parental status
- Race or ethnic origin
- Religion or belief
- Sex
- Sexual orientation
- Veteran status

We value all peoples and cultures, celebrating our differences and treating each other with respect, kindness, and fairness. We show sensitivity to cultural differences and comply with local employment and equality legislation. We recruit and develop a workforce that reflects the diversity of the communities in which we work. We are fair and open in our decisions about hiring, promotion, and compensation because this leads to more equitable outcomes.

Everyone has a role to play in making our work environments more inclusive, so that all colleagues feel able to be themselves and perform at their best. This includes our shared responsibility for being allies and respectfully challenging and reporting behavior that is not acceptable.



Operating safely

We are committed to behaving and operating safely. Everyone has a right to go home without harm to their physical or mental health. If we can't perform a task safely, we won't do it.

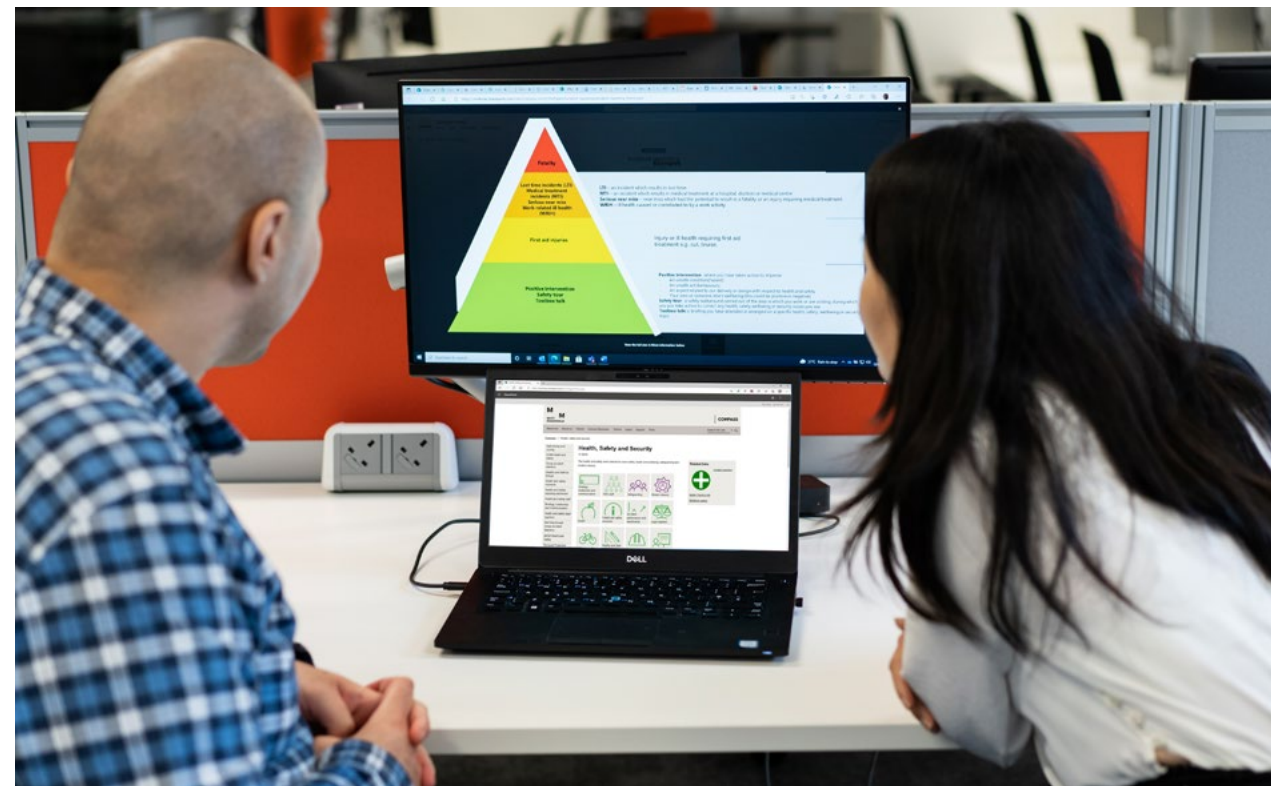
Through application of safe systems of work and strong leadership, supported by a comprehensive training program, we aim for zero harm — part of our duty of care to all we work with. We commit to complying with all local legal and regulatory

requirements and to fulfilling the requirements and processes relevant to our contracted and professional roles, working to our standards where they are higher.

We all have a role to play in identifying, assessing and mitigating risks, and speaking up and intervening if we observe or suspect unsafe practices. We will stop work when necessary to prevent an unsafe situation developing.

We all have a personal responsibility to come to work in a fit state, free from the influence of alcohol or drugs — including prescribed and over-the-counter medications. Performance and judgment must never be impaired.

All safety incidents, no matter how minor, must be reported through our health and safety portal so that action can be taken to prevent recurrence and promote learning.



Valuing health and well-being

OUR WELL-BEING FRAMEWORK/ VISION

- MY MIND
- MY RELATIONSHIPS
- MY WORK
- MY BODY
- MY FINANCES
- MY LIFE STAGES + EVENTS



Our goals as an organization depend on each of us being able to thrive and achieve our full potential. We know that good health and well-being support a good business. So we are committed to creating an open and honest culture where everyone is able to be happy, healthy, and safe.

We encourage all colleagues to develop a broad understanding of well-being and to take ownership and responsibility by applying the five ways to well-being: to keep learning, which boosts self-esteem; to connect with family, friends, colleagues, and community; to take notice of and engage with what is going on around

us; to give attention, time, and energy to something worthwhile outside work; and to be active, because any and all forms of exercise are mentally as well as physically beneficial.

We promote agile working, which enables flexibility in managing the demands of work and home life, while remaining productive and connected.

Respect, inclusion, equality, and safety are all fundamental to our well-being culture. Line managers are encouraged to intervene on well-being issues. All colleagues can find support through our external Employee Assistance Programs.

Our Code.

My pledge:



Speak Up

If you have a question about how we conduct our business or suspect a breach of Our Code, don't keep it to yourself. Speak to your line manager, another manager, or a colleague in legal, human resources, health and safety, or other supporting function, as appropriate.

Alternatively, contact the confidential Speak Up helpline. **[Click here](#)** or search "Speak Up, Mott MacDonald."

3 | Conducting our business with integrity

We commit to business practices that are responsible, fair, and promote the highest standards of integrity. We comply with all legal and regulatory requirements and respect the customs and culture of the countries we operate in.



Preventing bribery and corruption

Simply, we do not tolerate any form of bribery or corruption. They can cause harm to Mott MacDonald, cause clients and business partners to lose trust in us, and damage the communities in which we work.

Bribery and corruption

We are committed to countering all forms of bribery and corruption. We support initiatives to eliminate them, and work to continually improve our anti-bribery and corruption systems and practices.

We comply with all anti-bribery and corruption laws and will never offer or accept bribes, kickbacks or other improper payments. We prohibit improper payments, including payments to secure permits or approvals, and small payments to speed up a routine government process (often known as “facilitation payments”).

We conduct due diligence to mitigate the risk that colleagues or those working on our behalf will be exposed to bribery or corruption when working on projects or providing services.

Anyone who suspects bribery or corruption is taking place must report it to a manager, the legal team, or through the Speak Up helpline.

All allegations of bribery are investigated. Appropriate follow-up steps are taken, with breaches reported to the police and other relevant authorities when necessary.

Fraud

Any fraudulent and dishonest conduct is unacceptable, within our organization or in those we do business with. Fraud can take many forms, including false representation, failing to disclose information, and abuse of position. It is important we are all vigilant to identify and report fraudulent or dishonest conduct.

Money laundering and tax evasion

We are all responsible for protecting our business against money laundering or tax evasion.

Money laundering is the process of hiding illegal funds or making them look as though they are legitimate. It also covers the use of legitimate funds to support crime or terrorism. Criminals may try to hide their identity or the identities of third parties, as well as disguise the origin of the funds they are seeking to launder.

Tax evasion and the failure to prevent its facilitation, however minor, are criminal offenses. Wherever they are in the world, nobody who works for us or on our behalf should facilitate a third-party taxpayer to evade tax. Suspected incidences must be reported to a manager, the legal or finance team, or through the Speak Up helpline.

Exchanging gifts and hospitality

Exchanging gifts and hospitality can generate goodwill and be part of building and strengthening business relationships. However, we do not offer or accept gifts or hospitality that could appear to create an improper advantage for Mott MacDonald, or improperly influence us or any third party. Everyone working for or with us must use good judgment and ensure their actions cannot be viewed as inappropriate or constitute a bribe.

Before offering or accepting any gift or hospitality, we consider if it is part of a regular pattern, or if it places an obligation to deliver something in return. Close attention is paid to the timing of any gifts or hospitality, which must never be offered or accepted during a tender process.

Particular care is taken when dealing with government or public officials or making charitable donations to ensure that such transactions do not breach anti-bribery or corruption laws.

Any gift or hospitality offered or received must have a business purpose and be reasonable and proportionate in terms of value, nature, and occasion. Gifts or hospitality must not include cash or a cash equivalent. Care is applied when offering or accepting any gift or hospitality that involves family members.

All gifts and hospitality above set limits must be discussed with line management and included within the Mott MacDonald gifts and hospitality register.

When in doubt, seek advice from the legal team.



Managing conflicts of interest

To protect the integrity of our decision-making we never allow an external interest to influence, or appear to influence, our judgment. We protect our ability to make decisions in the best interests of Mott MacDonald by avoiding all actual, potential, and perceived conflicts of interest when possible and managing them when they are unavoidable.

Personal conflicts can occur in many different circumstances, including close relationships inside or outside the workplace, affiliations with competitors or suppliers, outside positions, or financial investments that may influence or appear to influence decision-making.

Organizational conflicts can arise when our role on one project has the potential to unfairly benefit Mott MacDonald in another role or project. They may compromise our ability to give impartial assistance or advice, or provide an unfair competitive advantage, compromising our stance on corruption.

Personal and organizational conflicts are identified and resolved swiftly. They are discussed with clients and other stakeholders where appropriate, and management plans agreed upon.

All actual, potential and perceived conflicts of interest must be entered into our conflict of interest management tool to ensure proper action is taken.

When in doubt, speak with a manager or seek advice from the legal team.



Competing fairly

We support open and transparent markets where businesses can compete fairly. This builds trust and provides the best value and outcomes for our clients, their customers, and society.

In our dealings, we respect competition and anti-trust laws as well as the ethical practices of the jurisdictions in which

we work, adhering to Our Code where that provides the higher standard. We do not engage in anticompetitive agreements or behavior, such as dividing or sharing markets, price fixing, limiting production or output, bid-rigging, collusive tendering, or other cartel behavior.

When exchanging information with a third party, we respect confidentiality. We do not exchange commercially sensitive information with competitors. If unilateral disclosures of commercially

sensitive information or other anticompetitive behavior are identified, we will cease the communication and take clear and immediate steps to remove ourselves.

Any anticompetitive practices must be reported to a manager, the legal team, or through the Speak Up helpline. All allegations of anticompetitive behavior are investigated. We take appropriate follow-up steps and inform relevant authorities when appropriate.

Respecting international trade and export controls

We respect and abide by national and international trade laws, including economic sanctions, anti-boycott provisions, and import and export controls.

Many countries impose controls on the movement of items across their borders, including goods, software, and technology. Specific licenses and approvals are required before listed items can be exported. When our business operations require us to export any item, we identify if it is listed and proactively comply with any relevant legislation.

Economic sanctions may prohibit or restrict our ability to conduct business with governments, entities, and individuals in certain countries. Sanctions change frequently, and we review and adjust our project work and business relationships accordingly. We understand who we are doing business with and conduct proper due diligence checks on business partners, clients, suppliers, and other third parties. These checks include screening for breaches of sanctions and other trade controls.

Any questions or concerns about international trade should be reported to a manager, the legal team, or through the Speak Up helpline.



Treating our clients, suppliers, and partners fairly

The support of our clients, suppliers, and partners is essential to the long-term success, resilience, and sustainability of our business. Mutual respect and good governance underpin all our business relationships.

We seek to work only with those who share our values and operate in a manner consistent with Our Code — in their dealings with us

and within their own supply chains. We conduct due diligence checks on our clients, suppliers, and partners. We communicate our expectations, monitor performance, and address any issues. This includes withdrawing from contracts if our standards are not being met.

We work innovatively with suppliers and partners to procure goods and services

sustainably and ethically and to deliver services to our clients at the optimum value and required quality. We endeavor to treat our supply chain fairly and consistently, and to pay them in line with contractual obligations.

We aim to always provide open and honest feedback on performance, and to be open to feedback on our own performance from others.

Our Code.

My pledge:



Speak Up

If you have a question about how we conduct our business or suspect a breach of Our Code, don't keep it to yourself. Speak to your line manager, another manager, or a colleague in legal, human resources, health and safety, or other supporting function, as appropriate.

Alternatively contact the confidential Speak Up helpline. **Click here** or search "Speak Up, Mott MacDonald."

4 | Protecting our assets and reputation

We commit to protecting our
brand, assets, and reputation.





Protecting our intellectual property

Intellectual property is the product of our technical excellence and can differentiate us from our competitors. When providing our services we generate and provide valuable intellectual property, over which we assert our ownership rights.

We all have a responsibility to manage and use our intellectual property appropriately, protect it from unauthorised use and ensure rights are not granted to third parties without suitable terms in place. It is equally important that we respect, and avoid

infringing, the intellectual property rights of others. Failure to do so risks damage to us and our reputation.

If in doubt, speak with a manager or seek advice from the legal team.

Securing information

Information security is essential in every part of our business. It helps build confidence and trust with our clients, business partners and colleagues. Information is core to our delivery of insightful and innovative projects, and to our own operations. Our services and reputation depend on maintaining the confidentiality, integrity and availability of information.

We undertake to protect information and never use, offer or accept it inappropriately. This includes

any type of information that is commercially, reputationally or legally sensitive.

Information is only shared if there is a valid business requirement and a legitimate need to know.

To protect our own data and information, as well as that of our clients, business partners and colleagues, we have controls in place governing how information should be accessed, stored, transferred and disposed of. This applies to information held electronically or on paper.

Any organisation or individual we intend to share confidential, sensitive information with must sign a confidentiality agreement in advance.

Any information security incident must be reported immediately by contacting the IT Service Desk (either by calling or raising an incident via My IT).

General questions or concerns about information security can also be raised through the Speak Up helpline.

Protecting our systems and assets

To enable us to do our jobs, we are provided with access to systems and assets. These systems and assets must be used only for their intended purposes, with care taken not to compromise security or expose Mott MacDonald to any type of risk.

While personal use of some assets is permitted, it should be appropriate and within reason, as allowed by local policies and procedures.

In addition, we must never expose our systems or assets to unauthorized persons, cause damage to them, or use them unsafely.

We use appropriate controls when sharing confidential information or using portable storage solutions. We never use unauthorized or unlicensed software, nor make unauthorized changes to our systems or assets.

Respecting privacy and data protection



In an increasingly digital and connected world, we are determined to maintain the trust and confidence of every individual whose personal information we collect, access, use, analyze, or store.

We protect the confidentiality and integrity of personal information, are open and transparent about how we process it, and only ever use it for legitimate business purposes.

We comply with privacy and data protection laws and regulatory guidance, and respect the associated rights of our people, our clients, and members of the communities in which we work. Where it is unclear whether we are processing personal information or whether it is being processed in accordance with the law and our policies, procedures, and values, seek advice from line management, local privacy practitioners, or the legal team.

Any suspected personal data breaches must be reported immediately to a manager and the IT Service Desk (either by calling or raising an incident via My IT), or the Speak Up helpline.

Engaging responsibly in political activity

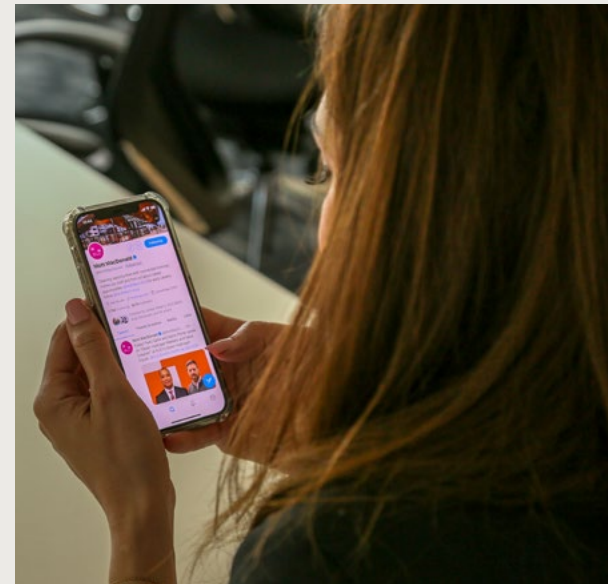
We respect each individual's rights to engage in lawful political activity. However, as we work closely with government departments, agencies, and regulators, it is important we keep any personal political activities separate from our role at Mott MacDonald.

Anyone undertaking political activity must do so in their own time and at their own expense. Such activity must never be attributed to Mott MacDonald and must be carried out in a way that will not conflict with professional responsibilities to Mott MacDonald and our clients.

Any lobbying of public officials or government representatives undertaken on behalf of Mott MacDonald must be approved by the executive board. Anyone we authorize to undertake lobbying activity on our behalf must comply with local lobbyist registration and transparency laws.

When we take interim roles or secondments in public bodies or government organizations, we always take measures to avoid any potential conflicts of interest.

Responsible public communications



Public communication plays an important role in raising awareness of the work we do with and on behalf of our clients. Positive articles, social media activity, thought leadership, industry collaboration, and participation in events can be some of the most effective ways to publicize Mott MacDonald's contributions and purpose.

We expect everyone who communicates publicly on behalf of Mott MacDonald to adhere to our PRIDE values, policies, and guidance and observe our legal and professional obligations.

Any public external communication must have the prior approval of our Group press office and relevant regional management and marketing leads.

This includes all forms of public communication, from talking with or responding to inquiries from the media to publishing content or speaking at conferences.

We always make sure we have permission from our clients to share any information externally about work we are doing for them. We instruct our supply chain to obtain authorization from us before publishing or speaking to the media about any work they are undertaking on our behalf.

When using social media in any capacity, we recognize that what we say online can affect Mott MacDonald's reputation. We therefore apply the principles of respect, inclusivity, and consideration to all our online communications, always present ourselves professionally, and make it clear that any personal views expressed are not those of Mott MacDonald.

Our Code.

My pledge:



**I will treat information with care
and only share when there are
legitimate business reasons.**



Speak Up

If you have a question about how we conduct our business or suspect a breach of Our Code, don't keep it to yourself. Speak to your line manager, another manager or a colleague in legal, human resources, health and safety, or other supporting function, as appropriate.

Alternatively contact the confidential Speak Up helpline. **[Click here](#)** or search "Speak Up, Mott MacDonald."

5 Delivering value to society

We commit to improving the communities and environments in which we operate.



Delivering social outcomes

Positive and inclusive social outcomes are at the heart of our purpose, in which we commit to improve society and deliver benefits for the communities in which we work. Our ambition extends beyond avoiding adverse impacts. We work proactively and seize opportunities to deliver transformational change.

We support the increasing emphasis our clients place on social value, social responsibility, engagement, and equality. Using our social inclusion expertise, we advise, support, and enable our clients to achieve better and more inclusive social outcomes for their communities.

We consider the social legacy of projects by focusing on long-term benefits and identifying opportunities to enhance accessibility, inclusion, empowerment, resilience, and well-being. We expect project teams to use available

knowledge, training, processes, and resources to achieve this. We work with colleagues across disciplines to holistically embed social inclusion opportunities into other global agendas.

We partner with clients to debate, provoke thought on, and advance a social outcomes-based approach in all we do.



Engaging with our communities

We commit to operating responsibly, respecting local cultures, traditions, and customs, and earning trust in our communities.

We support causes aligned with our PRIDE values that contribute to making society more inclusive, sustainable, and prosperous. We partner with like-minded organizations, including those that are not-for-profit.

By volunteering our skills, knowledge, and passions we help to improve the prospects and well-being of local people, particularly those who face barriers in society, by supporting them to reach their potential.



Advancing sustainability

We commit to being a leading global partner in advancing sustainability, creating positive social, environmental, and economic outcomes that provide lasting value for all. To achieve this, we promote company-wide alignment with the Sustainable Development Goals, are open and transparent through our Environmental, Social and Governance (ESG) reporting, and are members of the United Nations' Global Compact and the Carbon Disclosure Project.

We recognize both the climate emergency and the biodiversity emergency. We use the world's resources responsibly, optimize the use of materials for the life of the assets and infrastructure we design and build, and minimize or eliminate waste, including repurposing materials at the decommissioning stage. We avoid pollution and respect and protect wildlife.

We talk openly to clients and colleagues about our climate change agenda. We are reducing our own carbon emissions to net-zero by 2040 or sooner and will adapt as needed to remain resilient to the physical impacts of climate change. We are committed to working with our clients, partners, and suppliers to reduce their carbon emissions to net-zero and develop resilience to climate change risk.

We equip our people with the information they need to make informed decisions, encouraging them to address sustainability at the outset of each project, when it can be addressed at little or no extra cost. We view sustainability as a framework for initiating change in our operations and offices, as well as the projects we deliver.





Respecting human rights

We are committed to respecting the human rights of everyone who works for us, with us, or who lives in the communities we operate in. We reject modern slavery in all its forms, including servitude, forced or compulsory labor, and human trafficking. This includes providing a fair living wage for all our staff.

Our approach is informed by the United Nations Global Compact and the Guiding Principles on Business and Human Rights.

We never knowingly cause or contribute to any activity or relationship that violates human rights and will address adverse human rights impacts if they occur. We are vigilant in our communities and will report suspected human rights abuses.

We conduct due diligence on our clients, partners, contractors, and suppliers to ensure they follow the same approach.

Our Code.

My pledge:



Speak Up

If you have a question about how we conduct our business or suspect a breach of Our Code, don't keep it to yourself. Speak to your line manager, another manager, or a colleague in legal, human resources, health and safety, or other supporting function, as appropriate.

Alternatively contact the confidential Speak Up helpline. [Click here](#) or search "Speak Up, Mott MacDonald."



To develop Our Code we ran a number of listening sessions with colleagues globally that helped shape our thinking and are reflected in Our Code. **Thank you** to all those who either assisted with the listening sessions or otherwise contributed to the development of Our Code, some of whom are pictured.





mottmac.com

Our Code sets out our standards and expectations on the issues that matter to us; it is a guide for making good choices and living our PRIDE values.

Our Code is key to how we achieve and sustain success as a responsible business.

Together **Our Code** and PRIDE values help us all understand what doing things right means at Mott MacDonald.