



Code of Business Ethics

1.0 Introduction

1.1 Tate Consulting Engineers believes that its employees and business partners should follow principles dedicated to the highest standards of business ethics throughout the company's operations.

1.2 We operate responsibly and with integrity in our business conduct, aim to avoid any suggestion of impropriety, and rigorously observe applicable laws and regulations. There should be no risk to our reputation where any details about our business affairs become public knowledge. We must ensure our business is conducted honestly, scrupulously and free of deception and fraud at all times. We place particular importance upon taking timely action whenever necessary to identify, contain and eliminate illegal acts.

1.3 It is the duty of every individual employed by or acting for the company to follow the requirements of this code. They must raise their concern on any matter that appears to be in breach of this code, whether they are actively involved themselves or it involves the conduct of others. Usually they should first discuss the matter with their line manager at the earliest opportunity.

Where an issue remains unresolved to their satisfaction, or otherwise at their discretion, they should raise the matter directly with a Director. Alternatively they may raise the matter with the HR Manager in confidence.

2.0 Health and Safety

2.1 Tate Consulting Engineers recognises both its legal and moral responsibility for the health, safety and welfare at work of all employees. This responsibility also extends to others (such as subcontractors and the general public) for whom the company has a duty of care. Tate Consulting Engineers's policy is to meet all its legal obligation.

2.2 We adopt safe working practices and conduct our operations (including the use of plant and equipment) to the highest standards. We comply with relevant health and safety legislation and other requirements to which we subscribe. We continually seek to improve our safety performance by the setting and reviewing safety objectives and targets.

The Directors review health and safety issues at all management meetings.

2.3 All employees are made aware of and must comply with their individual and collective responsibilities, and have a clear duty to act in a safety conscious manner at all times. Employees are given information, instruction, training and the supervision necessary for their health and safety, and must take reasonable precautions to avoid injury to themselves and others.

3.0 Environment

3.1 Tate Consulting Engineers recognises its responsibility to the environment and the use of environmentally considerate practices. Tate Consulting Engineers's policy is to meet all its legal obligations.

3.2 We are committed to the positive protection of the environment, and always attempt to minimise the effect of pollution. We comply with relevant environmental legislation and other requirements to which we subscribe. We continually seek to improve our environmental performance by the setting and reviewing environmental objectives and targets. The Directors review environmental issues at all management meetings.

3.3 All employees are made aware of and must comply with their individual and collective responsibilities, and have a clear duty to act in an environmentally conscious manner at all times.

4.0 Customer Relations and Product Quality

4.1 Tate Consulting Engineers aims to meet customer needs with quality processes and performance.

4.2 We provide products and services to very high standards and in accordance with legal requirements. We take timely action to identify and correct any non-conformances, and are responsive to customers' enquiries and complaints.

We value all feedback and incorporate it into our continual improvement process to enhance our performance and customer satisfaction.

The Directors review customer and quality issues at all management meetings.

5.0 Corporate Responsibility

5.1 Tate Consulting Engineers recognises its responsibility for the members of the community. We have a duty to avoid prejudicial actions to the communities in which we operate and to enhance community life, where practical. Employees are encouraged to be active members of the community and to occupy voluntary positions helpful to the community.

5.2 Our interaction with the general public is conducted in a courteous, respectful and transparent manner. Prior to commencement, all work is assessed for its potential effect on the general public and the local community. Company vehicles are maintained and driven to a safe and high standard.

6.0 Business Operations

6.1 Financial Integrity

6.1.1 Tate Consulting Engineers ensures that no funds or assets are used for any illegal purpose, no unrecorded bank accounts or monies are maintained, and no liabilities are knowingly unrecorded.

6.2 Conflicts of Interest

6.2.1 Employees need to avoid any conflict between their own personal interests and those of Tate Consulting Engineers and its operations. This includes dealings with suppliers, clients and other parties doing or seeking to do business with the company. It also includes any other employment an employee is undertaking or considering. In cases of doubt, employees should discuss the matter with their line manager.

6.3 Business Gifts

6.3.1 Employees are not to give or receive any gift, favour or entertainment that could be deemed an inducement, from anyone doing or seeking to do business with the company. Any gifts or benefits should be lawful, ethical, necessary and appropriate, of nominal or moderate value, capable of reciprocation, and properly authorised; they should not be extravagant or too frequent.

6.4 Confidentiality

6.4.1 Employees have a responsibility to ensure confidential company information is not released to third parties, and observe rights and responsibilities under privacy and data legislation. Employees shall not use any confidential information for their own benefit or another party. Tate Consulting Engineers treats all personal and medical information as confidential unless disclosure is authorised by the individual concerned.

6.5 Information Security

6.5.1 The security of Tate Consulting Engineers information systems is critical to its operation and survival. Our objective is to ensure business continuity by protecting the information systems from all types of threat, and preventing and minimising the impact of any security incidents.

6.6 Fraud

6.6.1 Fraud encompasses an array of irregularities and illegal acts characterised by intentional deception. It is deceit resulting in financial advantage or loss and can range from a complicated scheme run by senior managers to a single] employee claiming excessive travel expenses or hours worked. It can be perpetrated for the benefit or to the detriment of Tate Consulting Engineers, by persons outside as well as inside the company.

6.6.2 Tate Consulting Engineers needs to maintain a sound system of internal control to safeguard the company's interests and assets, and take reasonable steps for the prevention and detection of fraud. We view instances of fraud most seriously, and we will seek to prosecute those responsible. Any employee found guilty of fraud may be suspended without pay and/or dismissed without notice, irrespective of their seniority or length of service. We conform to the Public Interest Disclosure Act and will ensure that any employees who 'whistle-blow' are not victimised.

6.7 Competition Act

6.7.1 Tate Consulting Engineers carries out its business in a manner consistent with all applicable laws and generally accepted industry practices. Specifically, we shall not operate any unfair competitive practices, agreements and conduct as outlawed by the Competition Act 1998.

7.0 Business Control

7.1 Operating Principles

7.1.1 Tate Consulting Engineers policy is to optimise growth in the value of the business by:

- creating a strong financial base and effective management of cash;
- increasing profitability of the business;
- identifying opportunities that enhance earnings and market value;
- developing business that is less exposed to economic cycles;
- creating flexible employment policies to attract, retain and reward good quality employees.

7.2 Risk Management

7.2.1 Tate Consulting Engineers seeks to minimise risk to its business by ensuring processes are clearly defined, properly aligned with business strategies, performing effectively and efficiently in satisfying customer needs,

building owner wealth and not exposing significant financial, physical, information and intellectual assets to unacceptable losses, risk taking, misappropriation or misuse.

7.2.2 We also seek to minimise the risk to our integrity from management and employee fraud, and illegal and unauthorised acts, which could lead to loss of our reputation in the marketplace.

7.3 Internal Control

7.3.1 Tate Consulting Engineers Directors conduct, at least annually, a review of the effectiveness of the company's system of internal control. The review includes financial, operational and compliance controls and risk arrangements. We use a Business Risk Model to identify, evaluate and manage the significant risks, which are reported on at board meetings.

7.3.2 The Directors prepare financial statements for each financial period, which give a true and fair view of the state of affairs of the company in accordance with company law. The Directors are responsible for keeping proper accounting records that disclose with reasonable accuracy at any time the financial position of the company and enable them to ensure that the financial statements comply with the Companies Act 1985.

7.3.3 The viability of suppliers is a key concern and our policy is to abide by the agreed terms of payment. We justify all transactions on commercial grounds and give weight to the quality of past service whilst ensuring that we consider alternatives when possible to avoid excessive dependence upon particular sources of supply.

8.0 Personnel

8.1 Employment

8.1.1 Tate Consulting Engineers aims to attract and retain quality staff and ensure they are adequately rewarded, well motivated and provided with career progression. We implement the highest standards in relation to our conditions of employment for all employees.

8.2 Equal Opportunities

8.2.1 Tate Consulting Engineers supports the principle of equal opportunities in employment. We oppose all forms of unlawful and unfair discrimination, in particular on the grounds of colour, race, nationality, religion, ethnic or national origin, gender, marital status, sexual orientation, disability, age, legal political activity or trade union membership.

8.2.2 We take steps to ensure all employees and job applicants are treated equally and fairly, and decisions on recruitment, selection, training, promotion and career progression are based on objective, job-related criteria. We ensure at all times our treatment is fair in terms of compensation, job security, work experience, recognition of achievement and opportunities for advancement.

We aim to ensure all employees are given equal help to attain their potential to the benefit of themselves and the company.

8.2.3 We ensure this policy is effectively communicated to all employees and give guidance to help them understand their legal and moral responsibilities. All employees have a responsibility to observe this policy, and in addition managers and supervisors have particular responsibility for ensuring the policy is fairly and consistently applied in all areas under their control.

8.2.4 The Company Directors are responsible for promoting equality of opportunity in employment, and for implementing, monitoring and regularly reviewing the policy to assess its effectiveness.

8.3 Recruitment and Training

8.3.1 Tate Consulting Engineers aims to achieve and maintain a workforce that is representative of the local community in each operating area, always bearing in mind commercial requirements and the need to have the best qualified and experienced staff in each position. We are committed to achieving and maintaining high

standards of performance and professionalism by ensuring all employees and subcontractors are properly trained and possess the skills and knowledge necessary to effectively perform their duties.

8.3.2 We ensure our recruitment, selection, training, development and promotion are based purely on merit and, where appropriate, business performance. We recruit employees for their relevant aptitudes, skills, experience and ability, and have a high commitment to training to provide appropriate skills and develop potential.

8.3.3 We regularly monitor the number of employees from different ethnic groups by job category and department as well as the ethnic origin of job applicants. We provide training in racial equality to all managers and staff responsible for recruitment and selection.

8.3.4 Managers and supervisors are responsible for ensuring that no employee or job applicant receives less favourable treatment or are placed at a disadvantage by requirements that are either directly or indirectly discriminatory.

All external vacancy advertisements incorporate the statement that Tate Consulting Engineers is an equal opportunities employer”.

8.4 Diversity

8.4.1 Tate Consulting Engineers is committed to being an organisation which is inclusive and values difference, by seeking to ensure that its services are relevant and acceptable to all. We recognise that people with different backgrounds, cultures, skills and experiences bring fresh ideas and perceptions that benefit the organisation and all of its stakeholders. We are working to embrace difference, listen to and meet the changing needs of our users, staff, partners and stakeholders.

8.5 Disability

8.5.1 Tate Consulting Engineers gives full consideration to applications for employment by disabled or handicapped persons where they are capable of adequately fulfilling the requirements of the job. Wherever practicable we provide continuing employment to existing employees who become disabled, under similar terms and conditions, with rehabilitation, retraining and career development as appropriate.

8.5.2 We recognise that the particular needs of disabled employees may require special arrangements to enable them to effectively fulfil their duties, and we assist where appropriate by adapting premises, modifying equipment, providing special aids and restructuring jobs.

8.6 Harassment, Intimidation and Discrimination

8.6.1 Tate Consulting Engineers does not tolerate harassment, intimidation or discrimination of any kind.

8.6.2 Harassment may be described as unwelcome conduct which results in the creation of a stressful or intimidating environment for the recipient. It is important to understand that it is the reaction of the recipient that determines what is or is not acceptable behaviour, not the intention of the perpetrator.

8.6.3 Harassment of a racial or sexual nature constitutes unlawful direct discrimination. In addition general “bullying” in the workplace is outlawed by both the Criminal Justice and Public Order Act 1994 and the Protection from Harassment Act 1997.

8.6.4 We do not tolerate discrimination, either by the company or our employees, against any creed, religion or personal belief provided that such creeds and beliefs do not advocate discrimination against or intolerance of other employees.

8.6.5 Tate Consulting Engineers can be held liable in law for acts of harassment, intimidation or discrimination committed by its employees, and individual employees can be held personally liable for acts they commit, authorise, contribute to or condone. Examples of such behaviour and actions include:

- discrimination against employees or job applicants on grounds established within the equal opportunities policy;
- inducing or attempting to induce, employees or managers to practice unlawful discrimination;
- indulging in verbal or physical harassment of a nature which is known, or should be known, to be offensive to the victim;
- victimising individuals who have made allegations or complaints of discrimination or harassment or provided information about such discrimination or harassment.

8.6.6 We consider acts of harassment, intimidation or discrimination by employees to constitute gross misconduct liable to disciplinary action, which may include summary dismissal.

8.7 Disciplinary Action and Grievance

8.7.1 Tate Consulting Engineers has a procedure in place for dealing with any disciplinary action or grievance, including any concerns that employees may have related to this code. We deal with these issues promptly and thoroughly, and take appropriate remedial action. We aim to ensure a fair and systematic approach to the enforcement of standards of conduct affecting all grades of employee within the company.

8.8 Alcohol and Drugs

8.8.1 Tate Consulting Engineers Alcohol and Drugs Policy is intended to prevent risks to employees, clients and the general public from misuse of alcohol and drugs. No person shall report for or undertake work whilst under the influence of alcohol, controlled drugs, abused substances or medicines that may affect their perception, alertness or physical abilities. Similarly no person shall be in possession of or consume alcohol or drugs whilst on duty.

8.8.2 Alcohol and drugs affect performance, conduct and relationships at work, and employees who develop alcohol and drug related problems cause not only harm to themselves but also to others. We treat any employee with such a problem sympathetically, in strict confidence.

8.9 Worksafe Code

8.9.1 Tate Consulting Engineers operates a 'Worksafe' (or refusal to work) code for all personnel employed on its construction sites. Every person has the absolute right to decline to carry out work if he/she feels it is not safe or environmentally unacceptable to do so, free from any disciplinary action. Personnel must report any such situation to their line manager as soon as possible, and not recommence their work until the issue causing concern is resolved.

8.10 Stress

8.10.1 Tate Consulting Engineers is actively addressing the issue of occupational stress to safeguard the health of employees. With today's fast pace of living, stress related problems are becoming more common. This has a negative impact on performance at work and reduces the enjoyment of home life. All employees need to be vigilant in identifying the symptoms of stress in both themselves and colleagues.

8.11 Electronic Communications

8.11.1 Tate Consulting Engineers provides guidance on the use of emails, including personal emails and those of a confidential or highly sensitive nature, and prohibits defamatory, abusive, sexist or racist messages. Whilst proper consideration is given to an employee's privacy, use of the company's email system is not private and is subject to scrutiny. Where the policy is abused, or loss or damage is caused to the company as a result of an employee's actions, we may institute disciplinary action including dismissal.

8.12 Use of Company Equipment

8.12.1 Company equipment and resources such as telephones, photocopiers, the Internet, etc, are essentially provided for business use. They must not be abused for personal purposes; only occasional and minimal personal use is tolerated. They must not be used in a manner that is illegal or places the company's reputation at risk. The use of unauthorised software is specifically prohibited. Employees should consult their line manager if they have any doubt.

8.13 Employee Involvement

8.13.1 Tate Consulting Engineers consults with employees as closely as possible and encourages their involvement with regard to the company's activities and improving performance. We actively embrace the requirements of the Information and Consultation Directive to provide effective and speedy communications with our employees.

8.13.2 Tate Consulting Engineers Improvement Team, comprising representatives for each of the operating areas, consults with employees on all matters of concern. The team holds regular meetings that provide an ongoing forum for feeding back information and ideas, reviewing particular aspects of the management system and seeking possible improvements.

Signed..... *Shane Tate*

Shane Tate, Managing Director
Tate Consulting Engineers

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