



Code of Conduct



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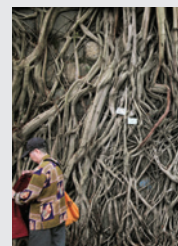


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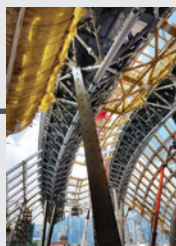


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Introduction



What is a Code of Conduct?

To sustain our business and allow it to develop and prosper requires that Gammon acts responsibly not only by complying with applicable legal and regulatory requirements but also in terms of how we conduct our day-to-day business, treat employees, business partners and other stakeholders as well as how we care for and contribute towards our society and the environment.

This Code of Conduct formulates a set of principles, which underpins our behaviour and conduct consistent with our beliefs, and guidelines, which explain how these principles are translated into practice.

The aim of these guidelines and underlying principles is to provide a framework for good business practices and strategies. Our core principles are:

- to abide by the legal and regulatory requirements in the countries where we operate;
- to instil a high standard of integrity, ethics and environmental responsibility in all aspects of our business dealings and operations;
- to observe the rights of our employees and the communities in which we work; and
- to create the means to effectively make the Code of Conduct an integral part of daily practice.

The overall objectives of implementing the Code are to assist in meeting the targets of:

- full compliance with all legal and regulatory requirements in each area of operation;
- eliminating bribery and illegal anti-competitive practices;
- achieving benefits in staff morale and positive feedback on our relationships with employees, business partners and the communities in which we operate;
- undertaking initiatives to promote greater environmental responsibility;
- good corporate governance and continuing improvement in the effectiveness of our processes to reduce risks to the Company's performance;
- creating a more sustainable workplace and environment; and
- making a positive contribution to improving business standards of integrity, transparency and accountability wherever we operate.



Who does it apply to?

The Code of Conducts applies to all of us. It should be followed by all directors and employees^[1] of the Company and its subsidiary undertakings (“Gammon Group”) in addition to individual policies and procedures already in place.

How to comply and uphold?

The Board of Directors is responsible for overseeing the development and implementation of this Code of Conduct. The Board will demonstrate visible and active commitment to the implementation of the core principles and provide leadership, resources and support for implementation.

- a. **Duty to report**
It is the duty of each of us to ensure that we will uphold our core principles, live by our values and abide by this Code of Conduct. We all have a responsibility to raise genuine concerns about malpractice and report suspicious circumstances as early as possible to enable the Company to take appropriate actions in an ethical manner.
- b. **Matters to be reported**
Examples of the types of matters that we are encouraged to report are:
 - failure to comply with legal and regulatory obligations;
 - the health and safety of any individual being put at risk;
 - suspected criminal offences such as corruption and fraudulent activities;
 - any form of harassment;
 - any financial irregularity; or
 - any concealment of any malpractice, criminal offence and the like.
- c. **Reporting channels**
The Company provides secure and accessible channels through which we can raise concerns and report suspicious circumstances on a confidential basis and without risk of reprisal.
 - i. We can in the first instance raise issues with their responsible manager or the director responsible for their business unit or department.
 - ii. If we believe that we cannot raise their concerns to the responsible manager or director or, having raised the issue, believe it is not being dealt with appropriately, we may approach the General Counsel and/or the Finance Director and/or HR Director, who will deal with the matter promptly and fairly.
 - iii. Alternatively, we may if we consider it necessary to report matters anonymously to the General Counsel and/or the Finance Director and/or HR Director, although it is preferred that we identify ourselves because it is usually difficult to hold a thorough investigation when the source is anonymous.
 - iv. If we feel unable to report or raise any matters of concerns according to the methods set out in i, ii, or iii above or believe that such matters have not been properly addressed, or we have been or will be treated detrimentally in relation to the concern we reported/raised, then we may report or raise such matters to and with the Chief Executive.



[1] References to “employee” or “employees” in this Code shall mean all directors and employees of the Gammon group of companies.



If any reported issues/concerns/matters have not been sufficiently addressed through any of the above methods, we may raise such matters with the Chairman of the Company's Risk Management and Compliance Committee who is a shareholder's representative and whose contact details will be made available to employees through the Company's usual communication channels, such as the Gammon intranet.

To further encourage us to raise concerns and report suspicious circumstances, the Company may from time to time implement an ethics or concerns helpline service, which will provide a secure and confidential channel by telephone, email or the internet, for employees to raise concerns, report suspicious circumstances or ask questions. Details of the ethics or concerns helpline service will be published through the Company's usual communication channels from time to time.

- d. **Company's undertaking**
Matters brought to the Company's attention will be investigated thoroughly and sympathetically and be brought to the attention of the Company's Risk Management and Compliance Committee with shareholder presence at its regular meetings. Appropriate feedback will be given to the employee who reported the matter.

It is the Company's policy to protect and support anyone who reports genuine (non-malicious and non-vexatious) matters of concern. Employees should be aware that the identity of the person reporting the matter may need to be disclosed to the relevant authorities should legal or criminal proceedings result from the report or may in any event be revealed by the information provided in the report.

- e. **Grievance**
The Company recognises the sensitive nature of complaints of discrimination, unfair treatment or harassment and will ensure that employees who wish to discuss such issues may do so in a consistent and structured format with total confidentiality. Employees will not be penalised for raising grievances.

In the event of a grievance being raised to a manager relating to discriminatory behaviour or harassment, the manager must notify the Human Resources Director or the Finance Director immediately, irrespective of how trivial the complaint may appear. Alternatively, employees may also refer such issues directly to the Human Resources Director or the Finance Director. All complaints will be treated in the strictest confidence. In connection with issues related to equal opportunities the Human Resources Director and the Finance Director shall be the point of contact.

- f. **Training**
Employees will receive general training at regular intervals and specific training on this Code of Conduct tailored to relevant needs and circumstances. Where appropriate, subcontractors and suppliers shall also receive instruction or briefings on this Code of Conduct.

- g. **Disciplinary actions**
The Company will apply appropriate sanctions for violations of this Code of Conduct, up to and including termination of employment or engagement under certain circumstances. Further, breaching this Code of Conduct may also in some circumstances lead to prosecution by the relevant government authorities.



1.0 We protect our people

1.1 Safe, healthy and secure working conditions and environment

- 1.1.1 Our vision is to have a workplace without injury or accident. You have a clear duty to yourself, your fellow workers and in many cases the public to take every reasonable precaution to set up and maintain a safe and secure working environment free from hazards. The Company has set up management systems and resources to plan, implement, control and continually improve performance in these areas. Strict wearing of PPE when on site and adherence to the policies, manuals, procedures and safe working rules are expected of all employees.
- 1.1.2 The Company will not tolerate any unsafe work practices or serious infringements or the consumption of alcohol or taking of drugs during working hours. In no circumstances should any consumption of alcohol, before, during or after working hours, affect your performance. Should such behaviour be detected you will be subject to different levels of disciplinary action including possible dismissal.

1.2 No Exploitation

- 1.2.1 The Company aims to allocate sufficient resources to manage the business effectively and to meet daily demands. The organisational structure, normal duties and expected working hours for employees are defined. All local official public and site holidays are observed and we comply with all laws governing minimum wages and minimum number of days of holidays.
- 1.2.2 Managers with authority may vary duties from time to time within reasonable limits. Working hours may also be adjusted, subject to compliance with Company guidelines, to suit project working schedules and to meet deadlines and such working hours are monitored and controlled to ensure employees are treated fairly and efforts are recognised. At no time shall excessive or prolonged periods of overtime work be encouraged. Should employees consider their workload to be excessive or their position is being exploited they are encouraged to discuss the matter with their manager or follow the grievance procedures.
- 1.2.3 Employees will have the freedom to join any union and the Company will not interfere in this regard.

1.3 Equal opportunities

- 1.3.1 Discrimination against any job applicant or employee on the grounds of colour, race, religion, age, nationality, sex, marital or family status, ethnic affiliation, pregnancy, sexual orientation, disability or other reason is prohibited. In certain cases however the requirements of safety regulations relating to specific positions within a construction business will take precedence.
- 1.3.2 Recruitment, job transfer and progression, remuneration, training and award of discretionary bonuses when applicable are determined solely by the application of objective criteria, fair and unprejudiced opinion, personal performance and merit. We have established guidelines for recruitment, equal opportunities, training, maternity and paternity leave and standard terms and conditions for application within each region.
- 1.3.3 We believe that a diverse and inclusive workplace delivers better customer solutions. We value and encourage unique views, perspectives and opinions of a diverse group.

1.4 Personal growth and development

- 1.4.1 We believe that our people are our greatest assets and support our employees in growing and developing both personally and professionally.
- 1.4.2 Other than training and learning on the job, we offer separate training and development opportunities to improve our employees' knowledge and skills.
- 1.4.3 You must take responsibility and actively contribute to your own learning and development.

1.5 Human Rights principles

- 1.5.1 We respect and protect human rights.
- 1.5.2 The United Nations Universal Declaration of Human Rights proclaimed certain fundamental rights and freedoms. These include the right to life, liberty and security, equal rights of men and women, right to protection under the law and against discrimination, slavery, servitude, torture or inhumane or degrading treatment, and freedom of speech, thought, conscience and religion. We uphold these human rights absolutely.





1.6 United Nations Global Compact principles

We further uphold the ten principles of the United Nations Global Compact, which includes freedom of association and effective recognition of the right to collective bargaining, elimination of forced and compulsory labour and child labour. We support a precautionary approach to the protection of the environment and work against corruption.

1.7 No employment of illegal workers or working illegally

The Company implements access controls to our sites and offices to prevent illegal immigrants or others who cannot be lawfully employed from entering or working on our sites or within offices under our control. We also monitor the presence of illegal workers on sites by conducting random checks. The Company will ensure that all employees engaged have the necessary visas, work permits, specific registrations, licences and qualifications needed before they perform the duties assigned to them.

1.8 No harassment

Harassment is regarded as any unwelcome conduct, which would be likely to offend, humiliate or intimidate any person or to give rise to an intimidating, hostile or offensive work environment. Employees, including directors and managers, must take positive steps to prevent harassment. Reports of harassment will be treated in the strictest confidence and every effort made to ensure that the victim is protected and not disadvantaged in terms of his/her employment or working environment. If you raise a complaint of harassment, the matter shall be investigated and acted upon to ensure you do not continue to experience such behaviour.

1.9 Outside work conduct, employment and investments

Employees shall take care not to bring discredit to the Company's interests or reputation through inappropriate behaviour outside the workplace and on the internet.

You shall refrain from engaging in outside employment, directorships with other organisations, business investments or activities that might conflict with Company interests. If you wish to take concurrent employment or a directorship with another organisation, either regular or on a consulting basis, you must inform the HR Director and seek the prior written approval from the Company before accepting.

1.10 Protection of personal data

The Company strictly prohibits any access, usage or disclosure of employees' personal data without legitimate authorisation. You should note that the Company reserves the right to retrieve your e-mails transmitted via the Company e-mail accounts and to monitor your use of the Internet.



2.0 We value our company

2.1 Protecting company assets

Unless otherwise permitted under Human Resources policies, Company guidelines and procedures, the appropriation of Company property by employees for personal use, or for resale is strictly prohibited. On termination of and at any other time during your employment when requested, you must hand over Company assets and records stored in whatever format or medium.

2.2 Confidentiality

- 2.2.1 The Company owes a duty to its customers, shareholders, employees and business partners to protect any confidential, privileged and personal information entrusted upon us. In order to ensure continued confidence in our services you are not allowed at any time to directly or indirectly disclose any such information to third parties without prior consent unless it has already been made public. Neither shall you use such information to further personal interest.
- 2.2.2 Use of material information that has not been disclosed to the general public could affect investors' decisions to buy or sell shares in our parent companies or business partners.
- 2.2.3 All media inquiries will be dealt with by the top management and the corporate communications team only. Should you be approached by any member of the media in relation to any matter concerning the Company, you will refer such inquiries to the Head of Corporate Communications or the HR Director as soon as possible.

2.3 Respecting intellectual property

The Company will, and each of the employees will, afford full respect to proprietary intellectual property and refrain from using any ideas, products and goods belonging to another without proper authorisation.

2.4 Proper recording and accounting and internal controls

- 2.4.1 Employees shall accurately enter data into the records and reports established and submitted. Falsifying documents, or furnishing false accounting records, receipts or invoices are considered offences under the laws of most jurisdictions and are strictly prohibited.
- 2.4.2 The Company will maintain accurate books and records, which properly and fairly document all financial transactions, selection processes, formal agreements and other records required under this Code and reference guidelines and procedures. We shall not maintain off-the-books accounts.
- 2.4.3 The Company shall maintain an effective system of internal controls, comprising taxation, regulatory, financial and organisational checks and balances over our taxation, accounting and record keeping practices and other business processes related to implementation of this Code.
- 2.2.4 We shall establish feedback mechanisms and other internal processes designed to support continuous improvement and shall subject the internal control systems, including the accounting and record keeping practices, to regular audits to verify compliance.

2.5 Uphold our reputation

- 2.5.1 The Company establishes, holds and maintains valid business registrations and operating licences to carry out business activities in each region and where applicable for each type of operation as required by local authorities and laws.
- 2.5.2 The Company shall only carry out its operations within the scope and conditions of these licences and registrations and in compliance with any local trade restrictions and export controls. Employees shall provide detailed and accurate information when requested by the Company for the application or maintenance of licences or registrations.
- 2.5.3 The Company has established legal experts who you must consult in all cases where you may have doubts or difficulties in understanding, interpretation or application of trading conditions, registration or licences.

2.6 Insurances

The Company shall arrange all required insurances through reputable insurance companies in accordance with local legislation and contractual requirements including where applicable comprehensive Employees' Compensation Insurance for all employees and subcontractors workers and third party vehicle insurance.

2.7 Tax compliance

- 2.7.1 The Company shall ensure full compliance with all local tax laws and regulations making full reporting of all income and expenditure, completing and submitting timely tax returns and making timely payments of all tax liabilities, making proper declarations for customs import and export duty purposes.
- 2.7.2 Similarly all remuneration paid to employees wherever located must be declared to the local tax authorities in accordance with local laws and regulations.
- 2.7.3 The Company has established guidelines for employees to follow and has appointed HR and taxation experts who must be consulted in cases where difficulties of interpretation or application of tax laws or duties may arise.





3.0 We respect our marketplace

3.1 Soliciting, accepting and offering advantages

Under the Prevention of Bribery Ordinance (Cap 201, Laws of Hong Kong) (“PBO”), the term “advantage” means:

- a. any gift, loan, fee, reward, commission consisting of money or of any valuable security or of other property or interest in property of any description;
- b. any office, employment or contract;
- c. any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part;
- d. any other service, or favour (other than entertainment), including protection from any penalty or disability incurred or apprehended or from any action or proceedings of a disciplinary, civil or criminal nature, whether or not already instituted;
- e. the exercise or forbearance from the exercise of any right or any power or duty; and
- f. any offer, undertaking or promise, whether conditional or unconditional, of any advantage within the meaning of any of the preceding paragraphs (a), (b), (c), (d) and (e).

Every employee is prohibited from soliciting or accepting any advantage from clients, consultants, contractors, subcontractors, suppliers or any person in connection with Company business. Soliciting or accepting an advantage in connection with your work is committing an offence, unless such has been considered by the management of the Company and is deemed to be outside the ambit of the PBO.

Where an advantage is given voluntarily acceptance may be considered only if:

- a. it will not influence your performance;
- b. you will not feel obliged to do something in return for the offer;
- c. you are able to openly discuss the acceptance without reservation; and
- d. the nature and the value of the advantage are such that refusal could be seen as unsociable or impolite.

If the acceptance of an advantage offered could affect your objectivity or decision-making process or induce you to act against the Company’s interests or perceived to be so, you should decline to accept. Similarly, if acceptance could lead to questions or complaints of bias or impropriety, the offer must also be declined.

Under no circumstances may any employee offer bribes to any person or company for the purpose of obtaining or retaining business nor may any employee accept any advantage from any person in relation to any contract for any government department or public body. For clarity it is also illegal to offer advantages to influence public servants or bribes in relation to public contracts and tenders.

If an employee has to act on behalf of a client in the course of carrying out the Company’s business, s/he should also comply with any additional restrictions on acceptance of advantages that may be set by the client.

3.2 Gifts, hospitality and expenses

- 3.2.1** You are prohibited from the offer or receipt of gifts, hospitality or expenses whenever such arrangements could improperly affect, or might be perceived to improperly affect, the outcome of a procurement or other business transaction and are not reasonable and bona fide expenditures.
- 3.2.2** In certain circumstances and cultures the nature (e.g. advertising or promotional gift, customary gift (Lai See) given during festive occasions) and the value of the advantage may be such that refusal could be seen as unsociable or impolite. In these cases all offers and receipts shall be declared by you to your supervisor. You should seek guidance on value thresholds when in doubt.

3.3 Entertainment, loans and gambling

You should turn down invitations to meals or entertainment that are excessive in nature or frequency, so as to avoid embarrassment or loss of objectivity when conducting Company business. In other circumstances entertainment is often an acceptable form of business and social behaviour and can have positive benefits. All entertainment expenses are subject to monitoring and internal approval.

Whilst there are no restrictions on normal bank loans, any employee or his/her immediate family should not grant or guarantee a loan to, or accept a loan from or through the assistance of any individual or organisation having business dealings with the Company.

Do not engage in frequent and excessive gambling of any kind, including games of mahjong, with persons having business dealings with the Company. In social games with clients, contractors or suppliers, you must exercise judgement and withdraw from any high stake games.

3.4 Conviction under Hong Kong laws and other laws

A breach of this Code may lead to prosecution and conviction under, without limitation, the Prevention of Bribery Ordinance and equivalent legislation in other jurisdictions. Such prosecution and conviction could have further serious and far reaching implications for individuals who are British nationals and, regardless of the nationality of the individual who committed the offence, for the Company and its UK shareholder who could face further criminal prosecution under the UK Bribery Act 2010. Upon conviction under the UK Bribery Act 2010 individuals can be sentenced to up to 10 years imprisonment and companies punished with unlimited fines.

3.5 Conflict of interest

Conflict of interest situations may arise when your personal interests compete or conflict with the interests of the Company. You should avoid such situations, actual or potential, which may compromise your integrity and put the Company's interests and reputation at stake. Employees must declare to your direct supervisor and to the Head of Division or Head of Department any financial interest, direct or indirect, which any customer or members of his/her immediate family may have, in any business or other organisation which competes with the Company or with which the Company has business dealings. You should refrain from any decision making in matters where you have a conflict of interest, and where your judgement may be or may be perceived to be affected by your vested interest.





3.6 Fair competition

The Company operates in countries where competition or anti-trust laws have been developed and apply. Under such laws certain conduct or business practices involving agreements or arrangements with competitors, which prevent, restrict or distort competition, are prohibited. Such conduct or business practices would include bid rigging, price fixing, market sharing, abuse of a strong market position or other anti-competitive arrangements. Any violation of these laws could involve serious consequences and penalties for the Company and the individuals involved. If in doubt as to whether any agreement or arrangement with a competitor is legal, you must seek guidance and consult the Company's legal experts.

3.7 Business relationships

You will adopt the highest standard of integrity in business dealings with customers, joint venture partners, agents, subcontractors, suppliers and other third parties with whom we have business relationships.

- 3.7.1 Customers - The Company aims to offer quality services which present good value, are safe, reliable and innovative and meet contract requirements. We seek to keep customers truthfully informed about our capabilities and aspects of performance avoiding misrepresentation or exaggeration.
- 3.7.2 Joint ventures - We shall undertake due diligence following established guidelines before entering into any joint venture and then on an on-going basis during the period of the relationship as circumstances warrant. Outputs shall be authorised at the highest level. When the Company leads a joint venture we shall ensure that the conduct of partners is consistent with this Code.
- 3.7.3 Consultants, agents, advisors and other intermediaries - Gammon undertakes due diligence following established guidelines before appointing any consultant, agent, advisor or other intermediary, and on an on-going basis as situations warrant. Employees shall follow Company procedures when entering into contractual relationships and supervising the conduct of an agent, advisor or other intermediary and ensure all agreements receive prior approval of senior management according to the Group Delegation and Limits of Authority. Provisions must be included in agreements relating to access to records, co-operation in investigations and similar matters pertaining to the contract.

The Company must seek to reach agreement with the consultant, agent, advisor or other intermediary to comply with this Code and subsequently monitor their conduct retaining a contractual right of termination in case of conduct inconsistent with this Code. You must ensure that compensation paid is an appropriate and justifiable remuneration for legitimate services rendered and is paid through authorised channels.

- 3.7.4 Procurement of goods and services (subcontracts and purchase orders) - The Company procures goods and services that represent good value, more sustainable and are obtained on fair and competitive terms using an open and transparent selection process and objective selection and performance evaluation criteria. With the exception of some regional or specialist businesses and unless otherwise agreed, employees are to conduct this process using Gammon's central procurement services to leverage on the greater purchasing power and collective information obtained across the business in order to secure lower rates and charges and potentially less risky, better, safer and more environmentally responsible services. You should follow the detailed procedures provided by the Company unless deviations have been authorised.
- 3.7.5 Negotiated contracts - When circumstances do not allow you to follow the prescribed tender process or for other valid reasons a proper record of the selection process, a basis of selection and authority shall be maintained. In all cases you must ensure that the Company is receiving good value on fair and competitive terms.
- 3.7.6 Due diligence - Employees will undertake due diligence in evaluating subcontractors and suppliers not only to ensure they can deliver the required product or services but also to ensure that they have proper employment practices and effective anti-bribery policies and procedures to ensure legal compliance and to control any significant impacts they may have on the environment. The Company shall make known its own policies and this Code and seek to influence the conduct of business partners and shall impose contractual rights of termination in case of conduct inconsistent with this Code.
- 3.7.7 Supplier and subcontractor partnerships - The forming of a working partnership for mutual benefit shall be voluntary and you must not give subcontractors or suppliers information that will in any way affect their selection in open tenders except where expressly defined within a transparent selection or performance appraisal system. The shared objectives established in any partnering arrangement are mutual goals requiring voluntary commitment from both sides and any failure to achieve an objective shall not affect payments or other opportunities falling under formal contracts.
- 3.7.8 Supplier, subcontractor and other payments - Compensation paid shall be appropriate and justifiable remuneration for legitimate services rendered and should be paid through authorised channels using accepted accounting policies. We shall discharge our contractual obligations in a fair, reasonable and timely manner without exception. In cases where variations to the work content arise requiring rapid mobilisation, employees shall keep an open mind and cooperative attitude in dealing with legitimate appeals and balancing the interests of overall project performance.



4.0 We contribute towards society

4.1 Working in community

- 4.1.1 As a minimum the Company seeks to engage with the local communities in which we work to find out their concerns related to our operations and where practicable to take actions to alleviate such concerns in a responsible manner. When approached by the media about Company affairs you are to follow the guidelines established and unless otherwise authorised you should direct such enquiries to our Corporate Communications Department. As a rule you are to treat members of the public with respect, courtesy and due consideration at all times.
- 4.1.2 As a Company we will also use our position and influence within the community to promote health and safety, sustainability and environmental protection and actively support and participate in relevant community, industry and professional association activities. We have pledged to make our safety and environmental performance data available to the public annually.

4.2 Contributions and sponsorships

The Company ensures that charitable contributions and sponsorships are not used as a subterfuge for bribery. All charitable contributions and sponsorships shall be subject to Chief Executive approval (or in accordance with the Group Delegation and Limits of Authority) with clear expressions of intent, shall be transparent to interested parties including all employees, shall be fully accounted for and made in accordance with applicable law.

The Company, its employees or intermediaries shall not make direct or indirect contributions to political parties, party officials, candidates or organisations or individuals engaged in politics, as a subterfuge for bribery.

4.3 Commitment in respect of environment

- 4.3.1 Caring for the environment and sustainability issues increasingly permeate all Company work initiatives and practices as increasingly society expresses a clear demand for more environmentally sustainable practices. We believe that ethical behaviour extends to our responsibility in protecting the environment. We wish to make a positive contribution to sustainable development and are committed to greater self-regulation and transparency in this area. Every employee is encouraged to contribute by integrating sustainability issues as they relate to our industry into our business planning, strategies and decision-making.
- 4.3.2 We shall adopt a precautionary approach in our operations and conduct an environmental review for every new undertaking to identify the significance of impacts associated with the activities under our control. A risk management process will also be applied whereby actions will be taken to identify those potential threats of serious or irreversible environmental damage and to deal with them using best available technology taking into account what is technically feasible and economically viable within our influence and customer requirements.

- 4.3.3 Progressively the Company will explore opportunities for the incorporation of environmentally benign material and process inputs and undertake whole life cycle cost assessment for selected products.

- 4.3.4 We treat compliance with health, safety and environmental protection regulatory requirements applicable to our business as a minimum standard expected to be adhered to by all employees. Management system processes ensure that all applicable legal requirements are identified and actions put in place to ensure compliance. You are required to obey the law and follow all applicable regulations.





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