

# Code of Conduct

Key Enviro Solutions Company Philosophy





## Welcome to our code of conduct.

Our code is our common language, no matter where Key Enviro Solutions operates in the UK or how the business challenges may change, our code anchors us to the principles and expectations that guide our daily activities, support ethical decision-making and set the standards for how we do the right thing.

Our code serves as the foundation of our company. It is how we do business - from the boardroom to the frontline. It shapes the way Key Enviro Solutions develops, how we interact with the communities we live and work in, and how we behave towards our people and everyone we have contact with. It is there to guide us whenever we are unsure or feel uneasy about the choices we face.

More than that, our code is fundamental to 'Who we are' both as a company and as individuals. It is how we live our purpose, how we care for others and how we play to win - the right way.

Finally, our code helps create an environment where everyone is empowered to speak up. To share ideas, ask questions, admit mistakes, give feedback and raise concerns without fear of retaliation.

Our **HONEST TALK** speak up channels outlined in the code are here for you. And you can choose the one you are most comfortable with, whether it is talking to a manager, to a supporting advisor or contacting **HONEST TALK**. You have a responsibility to speak up if you see or experience something unsafe, unlawful or inconsistent with our code. Key Enviro Solutions will listen - and Key Enviro Solutions will act.

Like any policy or requirement, our code is only effective if we read it, understand it and apply it with good judgement. I, and every member of our board and leadership team, hold ourselves accountable to the standards set out in our code. We expect - and we know - that you do too.

With the code as our guide, together we are building a stronger Key Enviro Solutions.

Paul Openibo

Managing Director



# ‘This is us’ and everything we do

This code is at the foundation of ‘Who we are’ and everything we do.  
We put safety first; living our safety leadership principles and following our OMS.

We make ethical decisions, act responsibly and comply with applicable laws.  
We are empowered to speak up if something doesn’t feel right. listen, and act if appropriate, when an issue is raised.

We thrive ‘Play to win’ but not at all costs; we do the right thing to win the right way, by living our purpose and always caring for others – together as Key Enviro Solutions

## Creating Spaces for Living Life Your Way With Heart Reach Mind

**Live our Purpose | Safety comes first** | Look after each other and our company – in the real world and online

**Make a positive impact** | Everywhere we work – and with everyone we work with

**Do the right thing** | Always follow our code of conduct

**Playing the Game is a Form of Winning the Game.**  
in those Competitions, **we Win by being Resilient**

**Play to Win | Know the competition** | There is always someone better – we seek out different views and learn from them

**Keep improving** Become more flexible, more digital and more efficient with the money we spend

**Accountable**  
We follow through on our promises. When we can’t – or make mistakes – we own it

**The More we Care for the Happiness of Others,**  
The Greater **Is our own Sense of Well-Being**

**Care for others** | Be kind - Get to know those you work with, show real interest, be supportive

**Prioritize the team** Leave your ego at the door, be inclusive, collaborative and open to honest feedback

**Put yourself in other people’s shoes** Especially our partners, suppliers and customers – ask how we can help them

Kim Stevenson

Head of Finance & Human Resources





## We always do the right thing

We are a trusted company that achieve our objectives, each of us commit to working to a high set of standards in everything we do and say, every day

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All our employees must read and understand our code of conduct, apply its principles and follow all expectations. Our code includes links to access other relevant Key Enviro Solutions requirements (policies, procedures and practices. A breach of any of our requirement is a breach of our code.

Our code of conduct is a public statement that Key Enviro Solutions are committed to doing what we believe is right. This means thinking about how you do things – as well as what you do – and speaking up when something doesn't feel right.

We often rely on you to use good judgement in line with our code of conduct, guided by 'Who we are' and our safety leadership principles. You have a responsibility to speak up when you have questions or concerns.

Whenever there is a conflict or a difference between an applicable law or regulation and our code, you must apply the strictest standard. If in doubt, contact our Head Office.

Our code of conduct applies to all Key Enviro Solutions employees' officers and members of the board. Our expectations apply both in person and online and your conduct does not have to occur in the workplace to violate our code of conduct.

Failure to follow our code of conduct could result in disciplinary action, up to and including termination of employment.

Third party business partners, can have a direct impact on our reputation through their behaviour. We only work with business partners that share our commitment to safety, ethics and compliance.

It is vital that all our contractors and their employees act in a way that is consistent with our code of conduct. We will take appropriate measures if we believe they have not met our expectations or their contractual obligations.

Neil Fletcher

Head of Operations and ESG



## Open up and speak up.

Each of us has a responsibility to speak up if we become aware of something unsafe, unlawful or inconsistent with our code of conduct. In line with our safety leadership principles, we encourage all employees to speak up, we want to learn why mistakes occur and respond supportively. If you want to raise a concern or have a question you need help with, you are not alone, we are here for you. All concerns are taken seriously and handled confidentially under Key Enviro Solutions management of concerns process.

We listen, act and learn whenever someone else speaks up. If you're ever unsure what to do if a concern is raised to you, support is always available to you.

## Let's Talk

Let's Talk, is a confidential way to raise concerns or get answers to your questions about our code of conduct. It is administered by specific company individuals at our head office.

Anyone, including contractors, partners, suppliers and customers can use Let's Talk. You can contact Let's Talk anonymously from most locations.

Anything you report will be kept confidential to the fullest extent possible consistent with law and good business practices.

## How we manage concerns and investigations

We listen to and assessing any concerns that are raised. Were appropriate, our Head Office team will investigate any potential breaches of our code.

## Zero tolerance for retaliation

Key Enviro Solutions do not tolerate retaliation.

We consider acts of retaliation to be misconduct. Retaliation can take many forms, including threats, intimidation, exclusion, humiliation and raising issues maliciously.

If you or someone you know has experienced retaliation, contact us At our Head Office

Mauricio Guterrez

Senior Client Liaison Officer





## Our expectations

### Diversity, equity and inclusion

At Key Enviro Solutions we treat everyone with fairness and respect and expect everyone we work with to do the same. We value the contribution each and every person brings to Key Enviro Solutions and in turn we take every approach to caring for our people so we can achieve fair opportunities for all. We recognize that diverse and inclusive teams accomplish more and can use their differences to outperform non-diverse teams.

- Help to maintain a culture based on inclusion and understand the needs of your colleagues alike.
- Create diverse and inclusive environments and experiences.
- Respect the diverse beliefs and opinions of ALL.
- Be respectful of cultural differences.
- Encourage and listen to those who open up and speak up.

### Workplace free from discrimination and harassment

#### Discrimination

Key Enviro Solutions do not tolerate any unfair discrimination within our company or in hiring, development and career progression.

- Base your work-related decisions on merit, including those relating to reward and other benefits.
- Do not discriminate based on race, ethnicity, national origin, religion, gender, age, sexual orientation, gender identity, marital status, disability, veteran status, or any other characteristic protected by applicable laws.

#### Harassment

We do not tolerate any physical, verbal or nonverbal forms of abuse or harassment. This includes unwanted behaviour that could reasonably be considered offensive, intimidating or humiliating, as well as any form of sexual harassment. Exclusion may also be considered harassment or bullying.

- Treat everyone with respect.
- Help create a work environment free from all forms of harassment.
- Do not engage in conduct that may be perceived by others as abuse or harassment.
- Do not communicate offensive messages, derogatory remarks or inappropriate jokes.

This includes comments of a sexual nature or any other sexually offensive behaviour. Look out for each other and challenge inappropriate behaviour.

Discrimination, harassment and bullying should be reported to your line manager, or contact us at our Head Office

Maddie Prole

Human Resources and Wellbeing Officer