

A long, brightly lit tunnel with a worker in a yellow safety vest in the center. The tunnel walls are lined with equipment and lights, creating a strong sense of perspective.

**MURPHY**

WORLD-CLASS INFRASTRUCTURE

**MURPHY**  
code of conduct

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## WELCOME

### **Our values are at the heart of everything we do.**

We put our clients and customers first, and expect all our employees to live and breath our values. That means behaving with the utmost respect and integrity towards those we work with and work for – be that our colleagues, peers, clients, customers or members of the public.

As a Murphy employee, you are part of a team that is improving life by delivering world-class infrastructure. To help us continue to do this and meet the high standards expected of us, we have to take responsibility, both as individuals and collectively, for our actions and manner.

This code of conduct is a helpful tool for you to apply our values to specific circumstances you might face. To reach the company's goals, it's vital that we all work together as one family, one team and one Murphy, helping each other to make fair and right decisions, and protect our reputation.

Remember that we must never take for granted the trust that others place in us. The way in which we conduct ourselves is vital to Murphy's continuing success.

Thank you for supporting our code of conduct.

**John Murphy - CEO**





## WHAT OUR CODE MEANS TO YOU

This code of conduct applies to everyone working for or providing services to Murphy at any of our locations throughout the world. It is based around our vision and values and details our expected standards of behaviour. Our reputation is directly affected by whether these principles are actively adopted in the workplace.





## EMPLOYEE ASSISTANCE PROGRAMME

The health and wellbeing of our employees is both important to us and fundamental to the success of our business. We know that there are times when everyone needs a bit more help and support, whether with a work related or a private matter. Our employee assistance programme (EAP) is there to help employees whenever they need a little more support. EAP employ specialists who can help with a wide variety of personal matters from relationship issues to debt management problems or work related concerns. It's available 24 hours a day, 365 days a year and is a free, confidential service.

### Contacts

UK: Help - 0800 840 4074 or [murphy.optimise.health](http://murphy.optimise.health)

Ireland: LAYA Healthcare - 1800 911909 or [www.layaeap.ie](http://www.layaeap.ie)

Canada: Work Health Life - 1-800-387-4765 or [www.workhealthlife.com](http://www.workhealthlife.com)







## INTEGRITY & RESPECT FOR ALL

### Value:

**We conduct our business in a transparent, honest and professional manner. We act with integrity and are trusted by all of our stakeholders.**

#### a. Stakeholders

Our stakeholders are our shareholders, employees, workers, clients, partners, suppliers, contractors, consultants, subcontractors and the communities in which we work. Our vision, our values and this code of conduct all help us to build relationships with our stakeholders that are based on professionalism, openness and trust.

We are committed to identifying, monitoring and managing any potential conflicts of interest that may undermine this relationship of trust between Murphy and its stakeholders. We report and maintain a register of potential conflicts of interest so that we can ensure that decisions are only taken in accordance with our stated

principles and conflicts are avoided. Individuals employed in a role that may involve them exerting influence over any decision making process must declare any other interests on an annual basis or confirm that they have none.

#### b. Fraud & Dishonesty

Murphy is committed to conducting its business in a fair and ethical way, without using unlawful practices to obtain an unfair advantage in our business dealings. Murphy takes a zero tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity. We uphold all laws relevant to countering bribery and corruption in all jurisdictions in which we operate, including the Bribery Act 2010.

We will not pay, request or receive anything of value in an attempt to improperly influence another party in securing business for Murphy. We will not request or accept anything of value as a reward or inducement to act improperly in relation to the awarding of business by Murphy.

We will not give, offer or accept a payment, gift or hospitality with the intention of securing a business advantage or to reward such a business advantage. We will not give or offer a payment, gift or hospitality to facilitate a routine procedure.

We do not make contributions to political parties. We will not make any payments to agents or third parties where we know or

suspect that the payment will be used for an improper purpose.

We maintain accurate and up to date records of all payments made to and received by Murphy.

Our employees must take care of our property and resources and only use them for the overall benefit of Murphy and for the purposes for which it has been issued. Employees must not make false claims for expenses or other payments.

Murphy recognises the support of its people in meeting these standards. Anyone who has any concerns can raise it with their line manager, the Privacy Officer or through the company's confidential helpline.





### c. Record Keeping, Commercial Practice & Security

Murphy maintains its books, records and financial statements in accordance with applicable laws and regulations, so that they provide a true and fair view of the state of affairs and performance of the business.

We prepare business plans and management reports to accurately monitor the financial health of the business.

We manage our processes to ensure that we pay our people and supply chain in a timely manner and so that we maintain our cash reserves. We collect and pay over taxes and other levies in compliance with our legal obligations.

Murphy is prudent in the management of its resources and conservative in its approach to commercial risks. We have established and comply with our delegated authority matrix so that transactions are only processed once the right level of approval has been secured.

We employ a specialist commercial team to manage the contractual and financial elements of our construction projects. We understand the contractual terms to which we have committed and ensure that we operate in accordance them.

We maintain accurate records in terms of time spent and materials provided and we administer each contract in accordance with its terms.

Murphy is committed to the protection of the assets, information and reputation of our business, our employees and our stakeholders. We proactively take steps to identify potential threats to our security, to assess the effectiveness of existing controls to manage those threats and to select an appropriate response.

We provide a safe and secure working environment.

We have a strategic approach to the security of our business, people and stakeholders. Security measures and procedures are regularly reviewed to maintain our high standards. We accurately record and consistently report incidents, including potential security breaches and irregularities.

#### d. Anti-Competitive Behaviour

Murphy recognises that competition benefits business. Competition creates free and transparent markets where businesses can work in an open and honest way.

We have a zero tolerance approach to anti-competitive behaviour. We operate so as to be compliant with laws and regulations around anti-competitive behaviour. We do not condone anti-competitive behaviour in any form and we seek to operate in accordance with the highest ethical standards.

Anyone who has concerns about or suspects that anti-competitive practices may have taken place is encouraged to raise it with their line manager, the Privacy Officer or through the confidential helpline.

#### e. Data Protection & Confidentiality

Murphy respects the privacy of all individuals and is compliant with laws and regulations relating to data protection. We recognise that the correct and lawful management of personal data will maintain confidence in the business and will provide for successful business operations.

Murphy only collects and retains personal data to the extent that it is reasonably necessary for the effective running of the business.

We have practices and procedures in place to ensure that the amount of data collected is not excessive and that it is not retained for an unreasonable period of time.

We take steps to ensure that the data we hold is accurate, up to date and protected. We maintain the security of personal data from collection to destruction.

We only share data to the extent that it is reasonable necessary for the management of the business.

We investigate any suspected breach of data protection principles and we take appropriate action to rectify and prevent re-occurrence.





#### f. Whistleblowing

Murphy recognises the essential role that compliance with legal, regulatory and supervisory requirements plays in the governance and sustainability of its business.

We encourage openness and we support anyone who raises genuine concerns in good faith, even if they turn out to be mistaken.

We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their concerns. Anyone who has any reservations, however minor, about security, fraud, integrity or conduct issues are encouraged to raise them with their line manager or a senior manager. Alternatively, Murphy provides confidential phone lines

#### **Contacts**

UK: Safecall – 0800 915 1571 or email [murphy@safecall.co.uk](mailto:murphy@safecall.co.uk)

Ireland: Safecall – 1800 812740 or email [murphy@safecall.co.uk](mailto:murphy@safecall.co.uk)

Canada: Julie Story – 587.349.9258











## ONE FAMILY, ONE TEAM, ONE MURPHY

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### Value:

**We work collaboratively to provide a seamless, integrated service to our clients.**

#### a. Employer of Choice

Murphy recognises that our people are the reason for our current successes and are fundamental in meeting our aspirations for the future. We value our people and we are committed to providing them with sustainable, long term careers.

We provide an environment where we are able to work together as 'One Murphy', irrespective of discipline or territory. Our matrix style organisational structure and family culture allows us to work together to achieve our objectives and gives our employees the opportunity to work in different sectors and territories.

Through our pay and grading systems, we have implemented a fair and transparent approach to reward and benefits. Further, we have established clear career paths and opportunities for promotion for all of our employees, whether weekly or monthly paid. We aspire to continually improve what we offer to our employees by keeping these systems under regular review.

Murphy invests in the development of its employees, providing on the job training and experience and funding for external qualifications. Through My Murphy Learning, we deliver targeted and accredited development programmes that support both personal and business excellence across all levels of the business, from graduates and apprentices through to senior management. Through our coaching and mentoring programme we support our people to achieve their aspirations and career ambitions.

We provide a safe and healthy working environment for all of our people. We undertake regular, confidential, employee satisfaction surveys so that we can better understand and respond to the needs of our employees.

## b. Fairness, Inclusion and Respect

Murphy is an equality and diversity employer. We take a zero tolerance approach to discriminatory practices or behaviours. We ensure that all job applicants, employees and contractors are treated equally. We do not discriminate on the basis of age, disability, gender, marriage or civil partnership status, pregnancy or maternity, race, religion or belief, sex or sexual orientation.

We value the diverse nature of our people and seek to manage any diversity issues in a fair and sensitive manner.

Our employees must act in accordance with these principles and are expected to treat colleagues with dignity, fairness and respect at all times.

We do not tolerate bullying or harassment in any form.

## c. Anti-slavery

Modern slavery is a crime and a violation of fundamental human rights.

It can take various forms, such as servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

Murphy has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships.

We are compliant with legislation aimed at preventing modern slavery in the areas in which we operate, including the Modern Slavery Act 2015.

We implement and enforce systems and controls that are designed to ensure that modern slavery is not taking place anywhere in our own business or in any of our supply chains. We expect the same high standards from all of our stakeholders.







## NEVER HARM

### Value:

**We protect people, the environment and communities no matter where we are or what we are doing.**

#### a. Never Harm

The health and safety of our people, stakeholders and the communities in which we work is of paramount importance to Murphy. We provide and maintain safe places of work, safe plant and equipment and safe systems of work. We are proud to have a strong, experienced and multi-disciplined SHESQ team operating across the business, supporting our 'Never Harm' commitment.

Our Integrated Management Systems (MIMS) is accredited to ISO9001, ISO14001 and OHSAS 18001 Management Standards. As a minimum, they ensure that we are compliant with all SHESQ legislation relevant to our operations.

We have in place comprehensive processes that enable us to identify, assess and manage SHESQ risk at company and project level. Our "top-down/bottom-up" approach means that we can control and

mitigate project risks through our SHESQ Management Plans, Risk Assessments, Aspects & Impacts Register, Method Statements and Works Package Plans. Project Inspection and Test Plans (ITPs) are developed to detail the quality control activities required to ensure and record that works have been delivered to the agreed contract requirements, drawings and specifications. Regular health surveillance monitors the effectiveness of our controls.

We measure and monitor our performance against annual SHESQ objectives and targets. We generate trust and confidence in our stakeholders by being transparent in our commitment to 'Never Harm'. As part of this, we publish our objectives and targets and performance in relation to them.

We employ professionals who are well qualified in their field so that we can advise and support all operational sites and functions.



We have implemented procedures to ensure that only approved and competent sub-contractors and suppliers are used on our projects.

Our industry leading Cultural Development Programme underpins all aspects of our business. By focussing on the thinking processes that come before our choices, we influence people to make the right choices in the first place and by doing so we enable a culture where 'Never Harm' is achievable.

#### **b. Protecting our Communities and the Environment**

Murphy seeks to continue to prosper in business with existing and future clients, whilst supporting our employees and the communities in which we operate. Our mission is to improve life by delivering world-class infrastructure.

We conduct our business in a manner that is safe, professional and ethical whilst paying particular attention to our customers' requirements and operating in a sustainable manner at all times. We plan and invest in the essential areas of sustainability: local employment, UK procurement and skills development.

We minimise the environmental impact of our activities by protecting the environments in which we operate and by taking steps to avoid pollution in all forms.

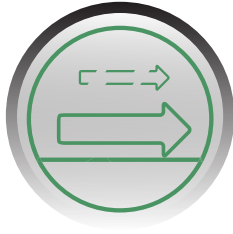
We minimise fuel, energy, water and waste in design, construction and use. We are signatories to the 2013 Carbon Infrastructure Review because we support the role that the construction industry has in helping the UK meet its carbon reduction targets.

We protect wildlife and habitats, archaeological remains and heritage buildings.

We seek innovative and cost-effective business solutions and we employ good practice to ensure projects are completed first time, on time and every time.

We engage, influence and collaborate with stakeholders to encourage the spread of sustainable technologies and services throughout our supply chain.

We regularly contribute to community improvement and charitable projects to ensure that we positively impact the social, economic and environmental circumstances of the communities in which we work.



## ALWAYS DELIVER

### Value:

**Our ‘can do’ attitude means that we aspire to deliver all of our projects on time, on budget and to the highest quality.**

#### a. Operational Delivery

As one of the most recognised names in the industry, Murphy has a proud history of delivering major infrastructure programmes in the UK, Ireland and internationally. We have built an enviable reputation with our clients for the safety, excellence and quality of our delivery.

Our matrix-based organisation enables us to deliver strong, well supported, operational performance and reinforces our values to our stakeholders as an integrated, open and collaborative business.

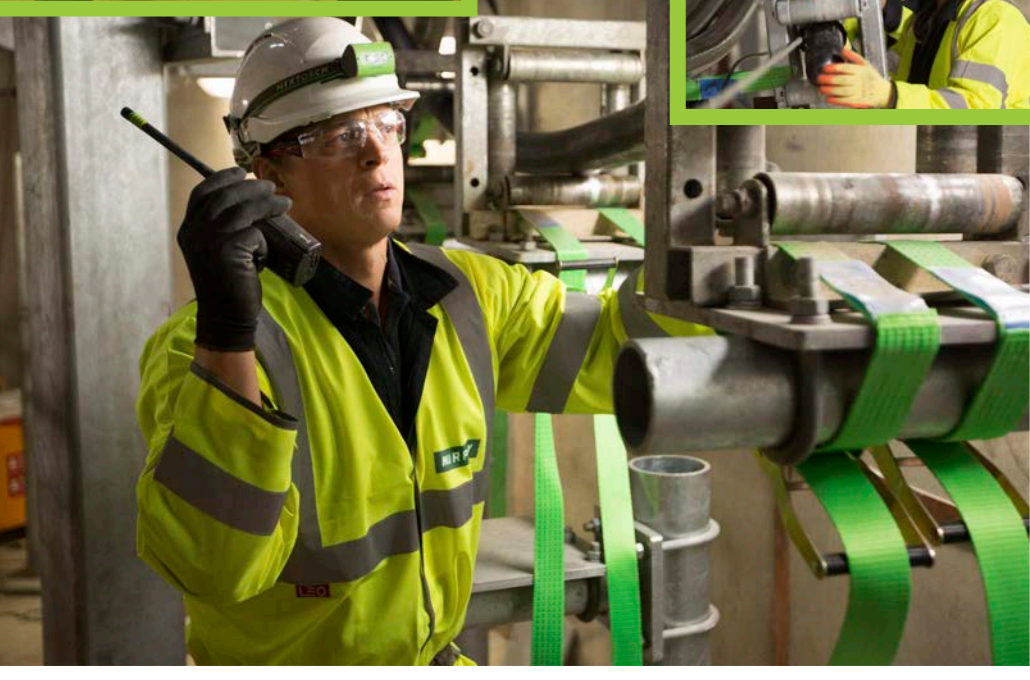
Murphy understands that infrastructure is fundamental to a successful economy and the government understands the economic benefits of continued investment in world-class infrastructure. The UK Government, our clients and prospective clients have all committed to investment in infrastructure projects. Through our focus on our five main sectors,

water, transportation, power, construction & property and natural resources, we can capitalise on our expertise and experience and respond to this published commitment to the investment in infrastructure.

Our structure and multi-disciplinary workforce allows us to react quickly and effectively to market sector conditions by transferring skills and resources across sectors as required.

Our central bid team enables us to be selective about the projects that we bid on, so we can meet our stated strategic objectives. We ensure that engineering is at the forefront of our proposition as we communicate our integrated offer and activities.

Our Group Support Functions underpin everything we do as a business, from winning profitable work, to mobilising right first time, through to assured operational delivery.







Efficient and effective support functions facilitate efficient operational delivery for our stakeholders.

### b. Better Engineered

Our dedicated engineering function delivers applied engineering and innovation excellence, allowing us to produce first-class engineering solutions for our clients and setting us apart as an industry leading engineering company.

We invest in and manage the careers of our engineers and equip them with the necessary skills to succeed through focussed training and development. We provide technical support, career development and talent management for our engineers, especially those seeking a route to chartered status.

We engage with universities in attracting the best talent into the industry.

We provide support and leadership for all of Murphy's engineers through a culture of continuous improvement and excellence.

### c. Governance

Our dedicated, in house, Legal and Governance function provides a first-class service to ensure that the business is compliant in everything it does, meets high ethical standards of integrity, transparency and fairness and enables the business to manage key contractual risks.

Despite being a family owned, private business, our corporate structure deliberately mirrors the higher governance requirements associated with listed companies. Our statutory board consists of mainly non-executive directors with only three executive directors being the CEO, CFO and COO. This ensures proper and independent oversight of the executive team.

We have independent, non-executive chairs for each of the Audit, Remuneration and Risk and Compliance Board Committees.



The  
Innovation  
Foundation





## CONTINUALLY IMPROVE

### Value:

**Innovation is integral to our success and we look to make improvements in all aspects of our work.**

#### a. Innovation Foundation

Murphy recognises that only through a culture of creativity and innovation will we continually improve how we win and deliver our projects by utilising new technologies, products or improving our systems and processes.

Innovation is a central part of Murphy's vision to deliver world-class infrastructure by bringing new or better solutions and processes or simply sharing good practices.

Everyone at Murphy is responsible for innovation, but we also have the Innovation Foundation and a network of champions covering all parts of our organisation, including projects, sites and functions

to facilitate that process. Our Innovation Foundation focusses on translating an idea, invention or process into a product or service that creates value. We recognise our innovators, those who are willing to challenge what has gone before, and we celebrate their success.

Our senior leadership team are committed to supporting our teams to deliver their innovation capability across our business

Through innovation and the development of new products, processes and ideas, we are able to exceed expectations in the delivery of our projects and continually improve the quality, safety and reliability of our work.

## b. My Murphy Learning

Our people are our greatest asset. At Murphy we recognise that developing talent is key to sustaining the success of our business and securing the future of the industry. We continually invest in all of our people from our apprentices and graduates through to our Group Executive Committee (GEC). Through the development of our people, we aim to be the employer of choice in our market.

Through our flagship Learning and Organisational Development function, My Murphy Learning, we deliver a targeted and accredited programme to support both personal and business excellence across all levels of the business, from apprenticeship through to the executive management programme.

Through our first-class graduate programme, we are able to attract new talent into the industry by creating an opportunity for in-depth experience working on live projects whilst undertaking a structured learning and development scheme.

## c. MIMS

The Murphy Integrated Management System (MIMS) has been developed and implemented to define and document our key processes and procedures, enabling us to meet our legal and stakeholder requirements.

MIMS covers all our operations and includes our processes for managing health, safety, quality and environmental requirements.

MIMS is made available to the business via the company intranet, which provides access to all policies, procedures, guidance and forms that constitute the management system.

## d. Cultural Development Programme

Our Culture Development Programme enables us to embed our values across our business. Through our bespoke company induction programme and our five core value events – One Murphy, Integrity & Respect, Never Harm, Always Deliver and Continually Improve – we engage with and educate all employees on what our values mean to us as an organisation and how each individual's choices and behaviours impact the achievement of our Ten Year Plan. Our values are sustained through business support and Culture and Engagement teams, ensuring that our people feel able to live by and demonstrate our values every single day.



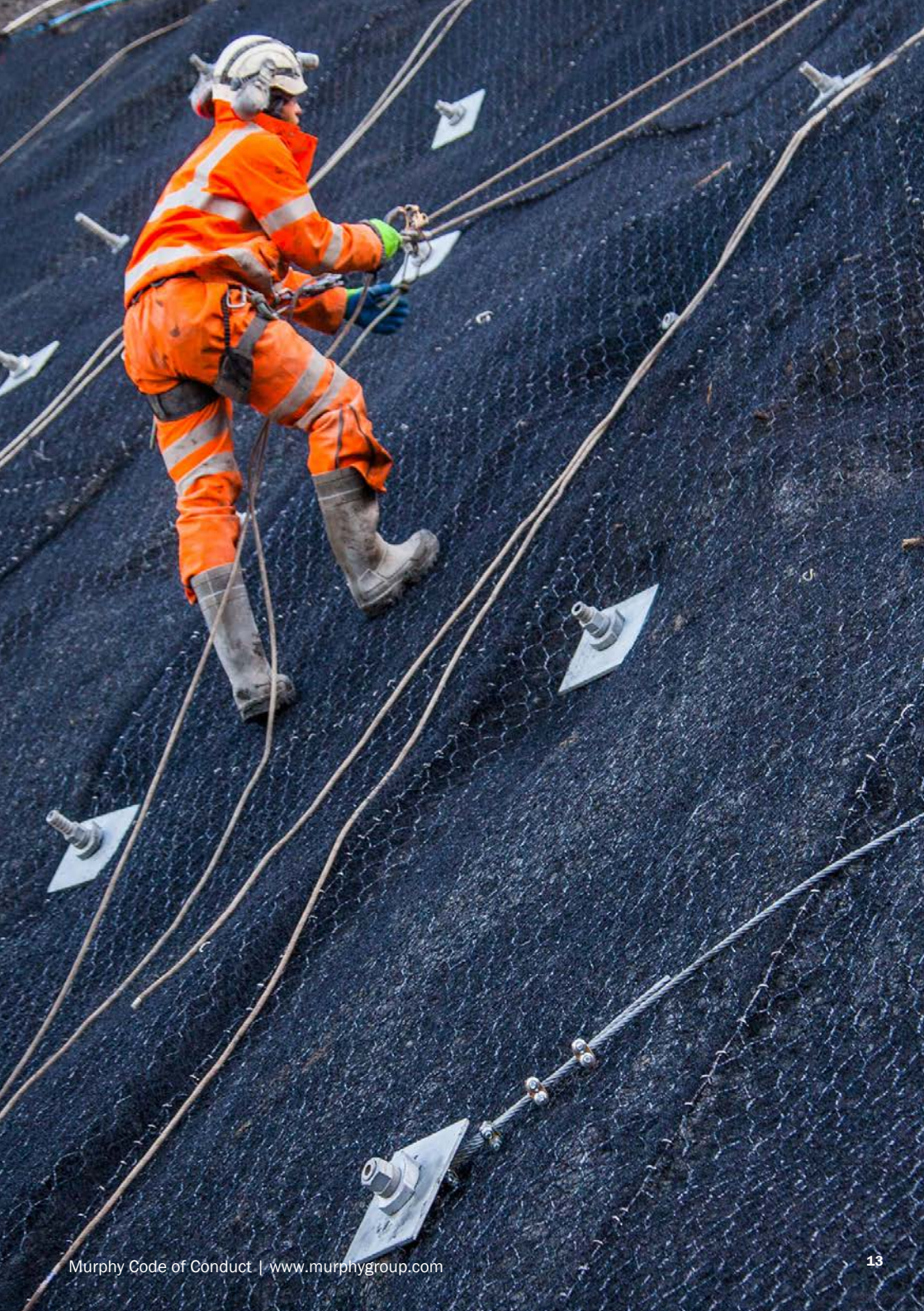




## NOTES

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# MURPHY

WORLD-CLASS INFRASTRUCTURE

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Improving life by delivering world-class infrastructure