

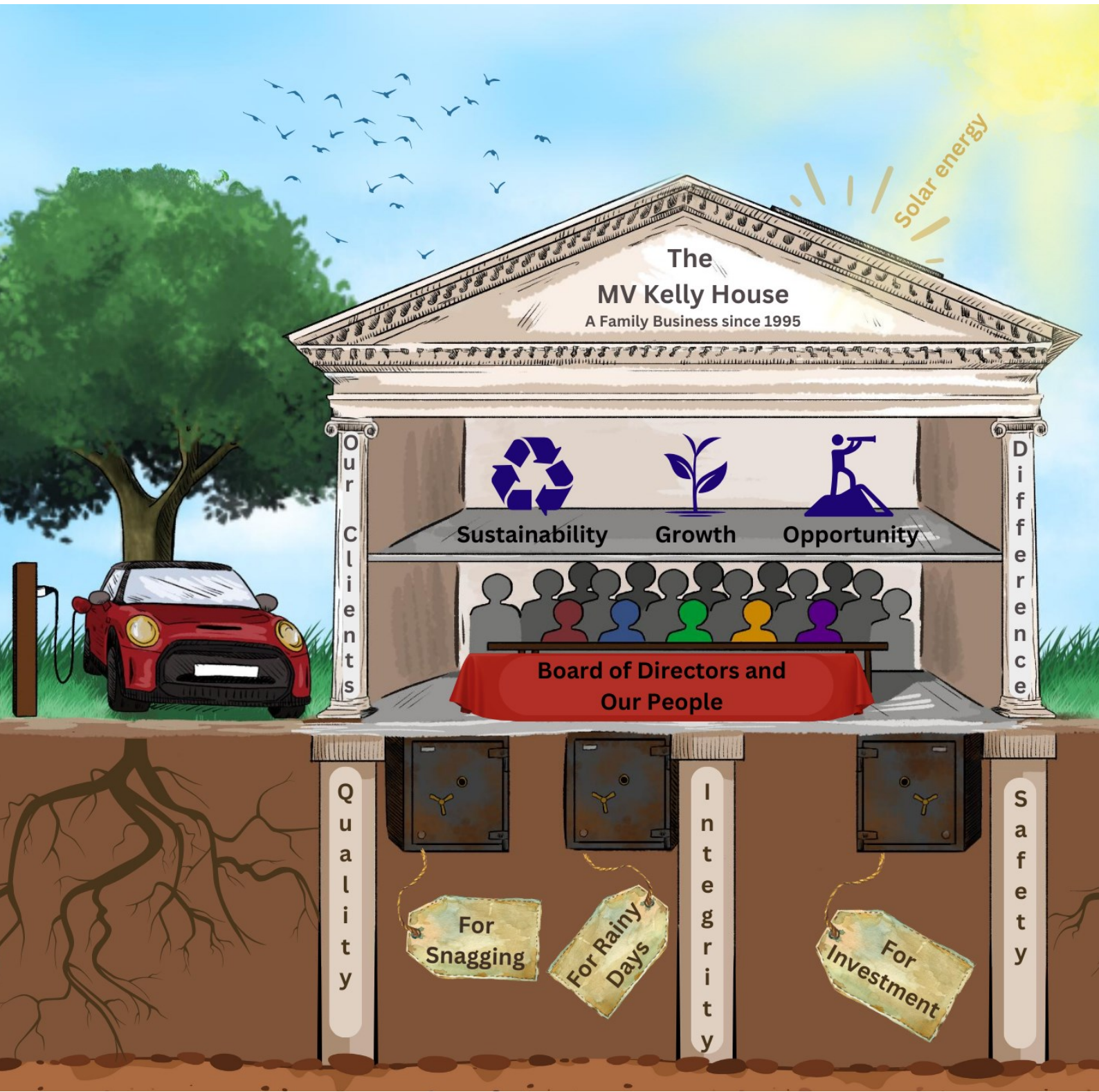
MV KELLY

CIVIL ENGINEERING

Code of Conduct - Who we are

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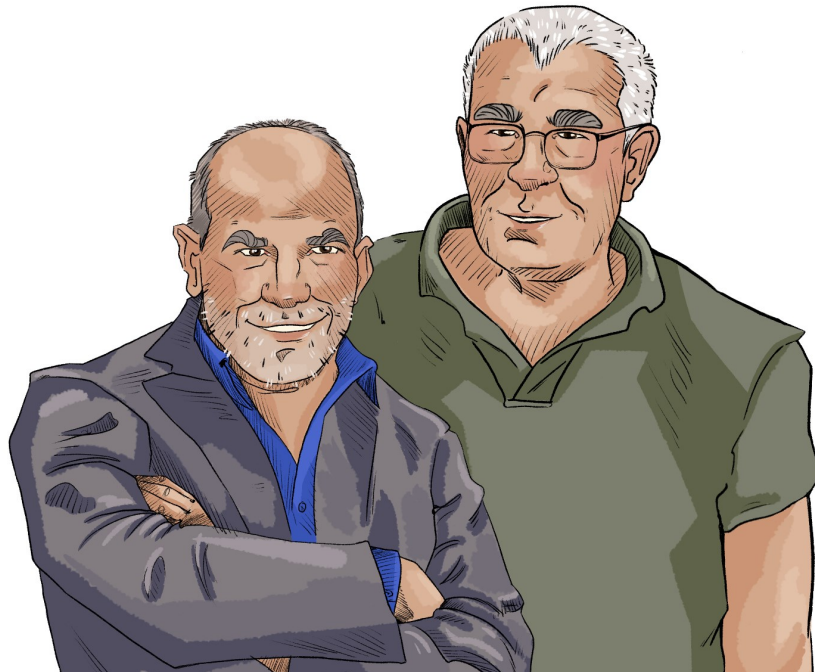
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1.0 Introduction

The success of MV Kelly comes from our founding principles that have helped the company become an industry leader. Through adherence to these principles, we have been able to share our success with many of our clients, staff, local community and charities, and we are intensely proud of that history.

This Code of Conduct sets out the actions, behaviours and attitudes we expect from our people, and also aims to empower them to speak out against wrongdoing.

There is no policy within MV Kelly that we hold closer to our hearts and this one policy reinforces all others. MV Kelly is a name that links some incredible likeminded people; past, present, and future. We do not take this success for granted and are driven to continually review and maintain what is good and improve where we can.



In the words of co-founder John Kelly...



MV Kelly continue to be a family company. We are extremely proud of the way the company has grown and what it's become. We're proud of the long serving staff here and the way they do things. We want those in high positions to always do the right thing - by production, quality, safety and avoiding shortcuts. We want to continue to build the company's reputation as one that gets things done and rewards those that work smart and hard to achieve great things. We want you to be an inspirational leader and be proud of where you work and who you work with, for many years.



2.0 What We Stand For

We are immensely proud of our values; they unite us in what we do and how we do it, and our values attract people who are compatible with them.

This Code is supported by the Shareholders, Board of Directors and applies to all our employees and third party associates.

Our values are the guiding principles of our company and are instrumental in our success. This Code helps our people feel empowered to make the right decisions and do the right thing.

Investment. Whether it be in our time or our people. Through our prudent and self-investment driven culture we have created a strength that allows us to make the right long-term decisions for our company and all our stakeholders (employees, subcontractors, clients, investors, owners, suppliers, partners, competitors, local communities, and the public). This investment enables us to deliver this Code of Conduct without compromise.

We want everyone to benefit from our actions; our employees, our clients, their customers, our supply chain, and the charities we support. In short, we want all stakeholders to benefit from what we do. Success on our own is not success.

MV Kelly is about empowering people to be their best and do their best. We judge and will be judged on what we do, not on what we say. We take a great deal of pride in sharing laughter, recognising and lifting others who are low, and sharing our own mistakes and vulnerabilities.

An MV Kelly person lives the values in this Code and has a great deal of pride in themselves and in this fantastic company we work for.

3.0 The Pillars of the Policy and Our Conduct

To cement our Code of Conduct policy we have linked it to our mission statement and values.



Our mission is to be the contractor of choice by offering the highest level of safety, expertise and quality with a family approach.



The six headings that underpin our intent to deliver this mission statement are: -



Safety - Is at the pinnacle of our operation and should never be compromised.



Our people - Attract the right talent and empower our people to achieve their fullest potential.



Our Clients - Our clients are at the heart of everything we do and their satisfaction drives our determination to succeed.



Quality Always - Our reputation is built and sustained through the quality of our work and processes. Always pursue excellence.



Integrity - In all circumstances, maintain honesty and integrity. Be trustworthy in all that we do.



Make a Difference - We share our resources, time, and energy to positively impact people's lives and the environment.

3.1 Safety First

Safety is at the pinnacle of our operation and should never be compromised. We are empowered to do the right thing and this empowerment allows us to make decisions that we will be supported in.

In all our actions we ensure that we are committing to our safety principle:

'Everyone to go home unharmed every day.'

Time pressure or individual pressure is no excuse for cutting corners or unsafe work or instructions.

Peter Gurr, MD for Taylor Wimpey for more than 30 years notes that...



Taylor Wimpey's Health and Safety standards are recognised in the industry as one of the best and we are proud to work with MV Kelly who have the same high expectations and culture on Health and Safety, right from site set up through to completions of site.



3.2 Our People

Attract the right talent and empower our people to achieve their fullest potential.

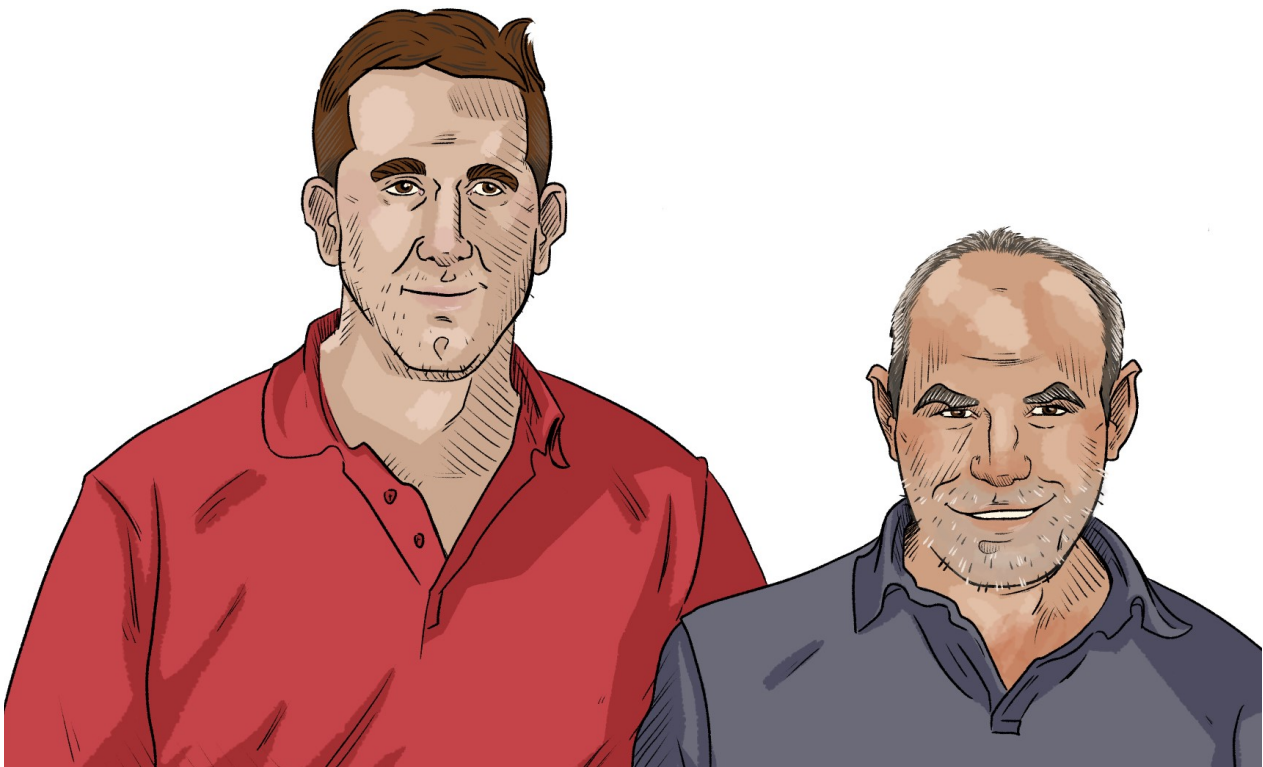
At MV Kelly, we want to employ the right type of person whose values match ours. We can train that person; accommodate and develop them, maximise their strengths and provide a stable and rewarding future at MV Kelly. We put more onus on those qualities rather than the skills and experience they may already possess.

Recruitment and promotion are both on merit. Only those most able are promoted to higher positions.

Paul Whelan, Managing Director since 2009...



I started at MV Kelly as a Senior Quantity Surveyor and was supported by the company to become MD in 2009. I felt young (I was 35) but the owners and other Directors supported me unconditionally, recognising an ability and ethos that fell in line with their own. As Directors we have dovetailed over the years; and whether a member of the Kelly family or not we have always been treated identically. That ethos has continued over the years and I know that we put the right type of person ahead of any other quality.



3.2 Our People

John Kelly...



When I was leading our team I always made sure that people knew I was very serious about doing a good job, building a great company and that I wanted staff around me that shared that view.

I think its important that everyone is proud to be part of the MV Kelly team and working with great people – people that mean business and are the best at what they do. All our leaders mirror this ethos and this will rub off on you too.



We treat everyone with respect.

We are hardworking and enjoy face to face interaction and the informal learning that delivers; applying the personal approach in all that we do.

We are team players and support others; and the team we play for is MV Kelly, not just a line manager, department or region.

We constantly challenge and develop ourselves. Nothing is beneath any of us, and this is what makes us a good company to work for. We do not wait for someone to ask us to do things that need doing. We will be expected to muck in and do the less popular, challenging work. Nothing is beneath any of us, and this is what makes us a good company to work for.

We are results driven and are focussed on training and developing all our staff. As individuals we are invested in by the company to enable us to deliver.

We are efficient, and we embrace technology or develop alternative work methods to improve those efficiencies.

We are passionate about the success of our company, and our personal success.

3.3 Our Clients

Our clients are at the heart of everything we do and their satisfaction drives our determination to succeed.

“People do business, not companies.”

Through our actions our clients know that their needs are important to us. They are our bread and butter and we stop at nothing to achieve the things that are important to them.

We invest our time and enthusiasm into forming longstanding, genuine relationships with our clients.

It is an essential part of many job roles to develop a strong understanding of our clients personalities and needs. We aim to become a trusted partner of all our clients and achieve a mutually respectful relationship.

We build trust and successful working relationships by being open, honest, and inclusive and by doing what we say we will. We finish our sites as well as we start. We stand by our workmanship, and we honour our guarantees.

We are compassionate, caring and understanding, we follow up on the ‘now or never’ moments and have challenging conversations when needed in a professional manner.

We embrace new ideas and ways of working within an ever-changing company and environment.

Best value for MV Kelly and our clients is achieved through optimising our labour force. We do not tolerate the work shy and we make no apology for rewarding the best and hardest working people across our company.

We want the best people in every facet of our business thus providing an exceptional product for all our clients at the very fairest price.

Mike Gaskell CEO / Majority Owner of Morris Homes identified that...



Morris Homes have an excellent long standing partnership with MV Kelly and we have enjoyed many years of working collaboratively together. MV Kelly have a strong focus on quality and are very responsive to our needs as a business.



3.4 Quality Always

Our reputation is built and sustained through the quality of our work and processes. Always pursue excellence.

We are compliant with our procedures, with our external duties, and with the agreed standards of each job.

Our approach is about getting the basics right first time, every single time. We do not over complicate.

Quality is absolutely key to the sustainability of our business. Whilst we always endeavour to meet all programmes in a safe and tidy manner, we will always request additional time if we feel the quality is potentially compromised.

We take pride in our work. We self-check our work and ask others to help if we are unsure. We accept that our work will be checked. No-one's work is beyond checking. When mistakes are made we learn and correct them thoroughly. We are accountable and take responsibility when our work is wrong.

By taking on board feedback and working collaboratively we are able to develop.

We fully support our continuous improvement process - education, steady improvement and sustainability.



Mark Bailey, Regional Managing Director of Barratts recognises that...



MV Kelly are one of our most highly regarded groundworkers who have demonstrated their commitment to quality assurance and assisted us in developing processes and procedures which are worker friendly but really contribute towards the delivery of quality.



3.5 Integrity

In all circumstances, maintain honesty, integrity and be trustworthy in all that we do.

We treat others well. We trust and are trusted. We play it straight, are candid and honest.

The difficult moments will pull us together not drive us apart. We are authentic and real, showing humility and vulnerability.

There is no place for egos or politics. We search for, and apply, the best ideas and share our knowledge, regardless of the source. We do not win individually.

We take responsibility for past actions, admit mistakes and fix them. By admitting mistakes quickly and sharing the solution we allow others to also learn from our errors.

We pick people up. We remember that people who make a lot of decisions and cover a lot of work occasionally make mistakes. We support the person who wants to make decisions, delivers enterprise, and works hard despite their fallibility.

We have self-respect and show mutual respect.

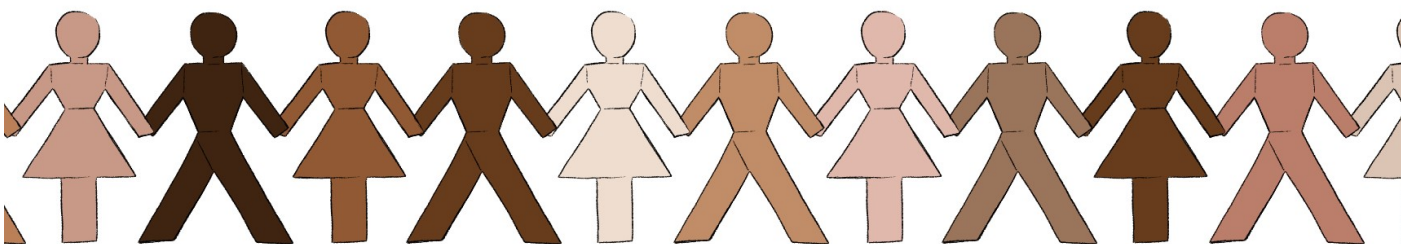
These qualities extend beyond the working day and include all company events, external staff interaction and when working remotely.

We expect everyone to act professionally and show respect at all times regardless of whether this is in an office, on site or at a company function.

We have a stringent Drug and Alcohol policy, which clearly outlines our stance in this area. Whilst we do not tolerate drug or alcohol misuse, we will support and also educate our workforce.

We avoid conflicts of interest and follow the correct notification process should we believe they have or may occur.

We reward fairly, in line with individual and company performance and attainment of our key performance indicators.



3.6 Make a Difference

We share our resources, time and energy to positively impact people's lives and the environment.

We take climate change and the environment seriously. We realise that we have a big part to play in reducing our carbon footprint and investing in a better way of working.

We are committed to our principle of sharing our resources with the community to play a part in helping those less fortunate to improve their lives.

In the words of Kent Martin (Founder of Betel UK)...



Meeting more genuine and kind people is rare. The company, individuals, and their family and friends have supported our Charities development in the UK without any formal requests for support. They offer help before we need and offer support without caveat. Drug abuse and supporting the broken and often "damaged and criminal pasts" is maybe not a fashionable cause to support but the restoration of lives with MV Kelly's support has been a massive success story.



We understand the positive impacts our contributions can have and that we are all expected to contribute on some level. This can be our time, our expertise, and our support or through financial contributions.

We believe that giving anything back, no matter how small, will have a positive impact on us, the person receiving the help, and the culture of the company. We will, where possible support staff and their families' good causes.

4.0 Pursue Excellence

We strive to always be better. We hold ourselves to the highest professional and ethical standards in all our work.

We have a lifelong approach to learning, irrespective of where we are now. MV Kelly does not stand still, we are on a constant journey.

We are proud of our hard-working culture, and our fast paced, resilient company which retains its family origins and approach.

We have high expectations of ourselves and of each other – we want to undertake work to the best of our ability.

We relish competition, we are proud of our regions, our departments and our company and we are happy to be judged against our internal and external competitors.

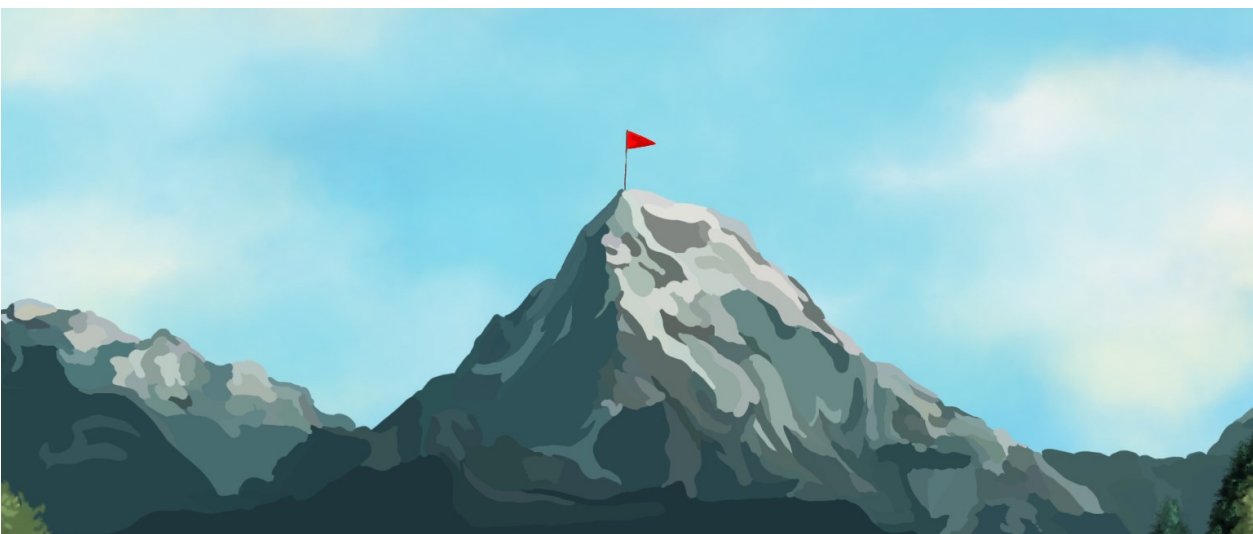
We protect company assets and look after all things as though they are our own including the reputation of the company. We know the company and what it's about.

We have a positive attitude, actively seeking to learn and apply our learning.

John Kelly...



If you've been promoted to a leadership role, this means we think you've stood out from the rest and shown us that you are both committed and capable. It doesn't mean you're the finished article, it never does. This will really only ever come with learning, time and experience.



5.0 Speaking Up

Before we speak up, we are encouraged to say “no” or “stop”. This immediate intervention may happen when....

- We witness an unsafe practice or action by an individual.
- We see staff or clients being unfairly criticised, harassed, or treated badly.
- A supplier offers incentives that we know are wrong to accept.
- We are asked to do anything that does not follow this or any other Code.



If we see conduct that falls short of our standards, and feel uncomfortable intervening, it is essential to speak up.

There are a number of ways to raise concerns or get advice and guidance. If we have to speak up we will choose whichever option we are most comfortable with, or that is most appropriate for the situation, confident in the knowledge that anything we report will be treated confidentially .

We understand that concerns may be raised anonymously. Nobody will be penalised for raising a concern in good faith, even if that concern later turns out to be unfounded.

If we are not comfortable talking directly about an issue to the person involved, or if it is not appropriate to do so, the concern may be raised with a line manager / supervisor, Director, or our Human Resources team.

6.0 Other Relevant Policies

We have other policies and procedures which this Code does not replace, but which are there to guide us in how we can represent the company's values. Policies within our company that relate closely to Code of Conduct include the following and will also be referenced within our Code of Conduct training: -

Drug and Alcohol

Anti-Bullying and Harassment

Anti-Slavery

Anti-Bribery and Corruption

Tax Evasion

Performance Management

Equality, Diversity and Inclusion

Gifts and Hospitality

Whistleblowing

A closing statement from our co-founder, Vince Kelly...



We have always invested in the best plant, the best gangs, and the best conditions for all our office and site teams. Nothing got me angrier than seeing a workshy and messy gang working on our sites despite the investments we had made. Our reputation was always my number one priority and from what I see now I feel very proud of what we have achieved. Thank you for all your support.

