

# THE ROBERTSON WAY

OUR SUPPLY CHAIN CODE OF CONDUCT



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## Supply Chain Code of Conduct

Our Code of Conduct sets out the standards of behaviour and business conduct we consider as good practice. It applies to all contractors engaged by Robertson including consultants, sub-contractors and those who are self-employed.





# A message from our senior management team

Across our business, we work ‘the Robertson Way’, an approach that reflects our principles and sets out how we should go about our work each day – acting responsibly and safely, and creating the best possible outcomes for our customers, partners and communities.

We hold our suppliers to the same high standards we set for ourselves.

This Code of Conduct details the types of behaviours we expect from our supply chain to ensure our collective success and that we meet our goals as a responsible business.

As you read through our standards, we hope you will embrace the principles that stand behind them and take the time to thoroughly understand the compliance aspects. Please

provide your employees with enough information and training to ensure they comply with the obligations set out here.

Where our projects, services, employees, stakeholders or supply chain do not reflect the Robertson Way, please tell us. Your feedback is vital to our continuous improvement, and you will always have our full support in challenging practices or behaviours that do not meet the standards we are committed to.

We recognise the vital part our supply chain plays in helping us deliver for our customers and appreciate your support in continually improving, innovating and delivering the Robertson Way.



**Elliot Robertson**  
Robertson Group  
Chief Executive Officer



**John Low**  
Robertson Residential Group  
Chief Executive Officer



**Martin Dick**  
Group Procurement  
& Supply Chain and  
Sustainability Director

# The Robertson Way

Our Supply Chain Code of Conduct is based on the Robertson Way, and the strong principles which have helped us grow into the thriving, modern organisation we are today. The Robertson Way encompasses our defined organisational purpose, vision and five principles that act as our shared values.

## Our purpose

### ***‘To assure a sustainable future’***

Our purpose is the why of our business – why we’re driven to do what we do and what makes us stand out from the crowd. It guides our daily decision-making and provides certainty and assurance:

- for our customers, the certainty that we will deliver what we say we will;
- for our people, the certainty of opportunity and progress, and knowing that their safety is paramount;
- and for the communities we operate in, the certainty that we will consult openly and work to build a positive and lasting legacy.

## Our vision

Our vision outlines the kind of future we aspire to and provides each of us with clear direction. At Robertson we want a world where:

- our people are assured of the opportunity to progress in outstanding careers;
- our business is professional, secure and sustainable;
- our customers have the certainty that we will deliver across the whole built environment lifecycle, tailoring what we do to their needs;
- our communities can look forward to a sustainable tomorrow thanks to the progress we make today.

## Our principles

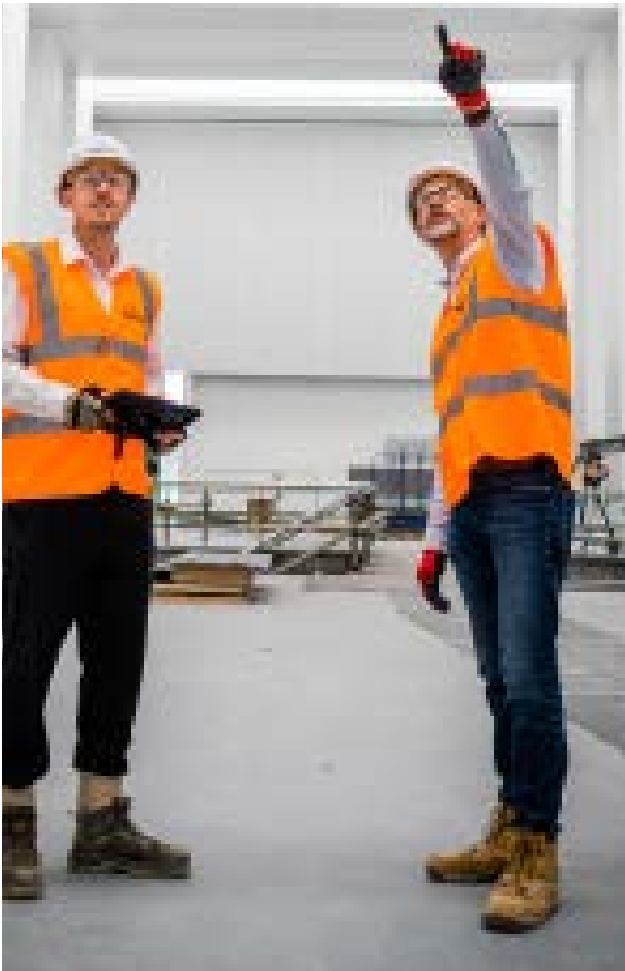
Core to Robertson are our time-tested principles. They are what we believe, what customers can expect, and how we deliver – the Robertson Way.

- We listen
- We are professional
- We take responsibility
- We are determined to succeed.
- We are one team

## We listen

Listening enables us to work positively and collaboratively, and gives customers, partners and colleagues the assurance that their voices are always heard.

**We are trusted to:** align ourselves with customer expectations and work together as a team as effectively as possible.



### Feedback

**Listen to and provide feedback to support continuous improvement and deliver the best possible customer experience.**

#### You will always

- Provide constructive, timely feedback.
- Keep colleagues, customers and partners updated about the progress of your work.
- Make it easy for colleagues, customers and partners to contact you.
- Take onboard feedback and use it to suggest improvements.

#### You won't

- Keep quiet if you are unclear about something, rather than ask for clarification.
- Miss opportunities to highlight problems or suggest improvements.
- Get defensive or confrontational when someone gives you feedback.

### Open, fair and respectful

**Foster a work environment where people can get the job done to the best of their ability, in a culture of mutual respect and support.**

#### You will always

- Be fair, polite and respectful in interactions, and take the time to really listen to what people say.
- Be open to other people's ideas.
- Be aware of your approach and adapt it to suit different people and circumstances.
- Keep customers and colleagues appropriately informed and regularly updated.

#### You won't

- Show unwillingness to compromise to reach the best solution for everyone.
- Hold back on asking for other people's views when you make decisions.

## We are professional

Our mix of prudence and diligence, care and attention to detail means that our customers have certainty and assurance in everything we do and trust us to deliver.

**We are trusted to:** conduct business honestly, responsibly and lawfully.

### Data Protection

Maintain effective privacy and security practices in accordance with data protection legislation and laws.

#### You will always

- Ensure you understand the legal requirements which apply to your role and business.
- Follow all relevant procedures and policies and maintain the expected standards and records.
- Ensure access to sensitive information is limited or on a need-to-know basis.
- Take appropriate technical and organisational security measures to keep personal and business information secure and protect it from loss or misuse.

#### You won't

- Share confidential, business sensitive or personal information out with agreed and/or contracted parties.

### Process

Have adequate processes, procedures and controls in place to maintain standards, identify and manage risk, and ensure regulatory compliance.

#### You will always

- Follow all relevant procedures and policies.
- Maintain expected standards, documentation and records.
- Give clear timescales.
- Communicate expectations clearly to employees.

#### You won't

- Make information or documentation overly complex or difficult to understand.



**We are trusted to:** conduct business honestly, responsibly and lawfully.



### **Fraud, bribery and ethics**

**Drive success through hard work, assuring quality and setting standards in best practice – never through illegal or unethical behaviour.**

#### **You will always**

- Accurately record all payments and benefits given to public officials as standard practice.
- Report any attempted bribery or suspicion of bribery.
- Ask Robertson before offering any kind of gift or invitation to ensure compliance with our company rules.
- Avoid even the appearance of wrongdoing.

#### **You won't**

- Participate in any form of corrupt behaviour.
- Make false claims.
- Conceal or fail to accurately record the true nature of your activities.
- Falsify or tamper with company books or records.
- Pay more than the fair market value for goods and services.
- Offer or accept gifts, hospitality or anything of benefit or value if it will impair objective judgement, inappropriately influence a decision or action, or create a sense of obligation.
- Solicit gifts or hospitality.

### **Integrity and diligence**

**Always do the right thing and be accountable for your actions.**

#### **You will always**

- Contribute professional expertise and operate to the highest standards.
- Remain calm under pressure and manage your frustrations and behaviour accordingly.
- Accept responsibility for your mistakes and focus on improvement.
- Challenge unprofessional behaviour when you see it at work.

#### **You won't**

- Blame other people when things go wrong.
- Allow pressure to negatively impact you.
- Fail to manage customer expectations.
- Ignore feedback about your work or opportunities to improve approach.
- Fail to manage your time or deliver on priorities and deadlines.

## We take responsibility

Each of us is accountable for what we do. From the smallest detail to team safety and caring for our communities and the environment, we know that everything matters.

**We are trusted to:** make responsible decisions about how we go about our work, and live up to our values and standards.



### Health and safety

Operate in a manner that actively manages risk and ensures a safe and healthy working environment for all.

#### You will always

- Seek to establish an incident-free working environment.
- Ensure employees have the suitable resources and equipment to carry out their work in a healthy and safe manner.
- Take responsibility for your safety and wellbeing, and those around you.
- Report any health and safety concerns that could lead to accident or injury.
- Report all health and safety incidents related to our projects and sites according to agreed requirements.

#### You won't

- Ignore relevant H&S procedures, legislation and regulations.
- Act in a way that puts you or others at risk.

### Alcohol and drug use

Robertson is an alcohol and drug/substance-free workplace.

#### You will always

- Ensure all employees are fit and healthy to carry out their daily activities and do not come to work if under the influence of alcohol, drugs or any other substance.
- Ensure employees comply with mandatory drug/substance testing at induction and further random periodic testing across all sites.
- Report anyone you suspect is under the influence of drugs, alcohol or any other substance at work.

#### You won't

- Tolerate substance/drugs or alcohol misuse of any kind the workplace.

**ROBERTSON**  
**home**  
**safe**  
IT STARTS WITH YOU

Safety is paramount and nothing is more important than ensuring everyone goes home safely at the end of every day.



**We are trusted to:** make responsible decisions about how we go about our work, and live up to our values and standards.

## Whistleblowing

Use avenues for raising concerns at work without fear or retaliation.

### You will always

- Speak up when you see something that puts yourself or other people at risk.
- Challenge unsafe behaviours and attitudes in others.
- Ensure your employees are aware of the whistleblower process.
- Handle concerns with the appropriate confidentiality.

### You won't

- Hide potential issues rather than ensure risks are managed appropriately.

## Training

Every employee is fully trained and informed to safely and efficiently carry out their responsibilities.

### You will always

- Complete the Mi Pre-enrolment online registration process and health and safety inductions before arriving at any Robertson site to help keep yourself safe at work.
- Keep skills and competencies at the relevant level and ensure training records are up to date.
- Match customer and project needs with employees who have the required skills.

### You won't

- Fail to ensure you or an employee has the required skills and competencies before any works are undertaken.

## Quality

Commit to quality outcomes to deliver on customer expectations.

### You will always

- Deliver to the agreed quality standards.
- Know the key performance indicators for your work.

### You won't

- Cut corners – always carry out work as planned.



The smartest way to ensure you're ready for a fast and safe start on site.



**We are trusted to:** make responsible decisions about how we go about our work, and live up to our values and standards.

## Sustainability

Take a proactive approach towards environmental and social responsibilities, to minimise any negative impacts from your work and contribute to healthier communities and climate protection.

### You will always

- Familiarise yourself with and support objectives in the Robertson Responsible Business (Sustainability) Policy and 2030 Strategy.
- Comply with local and national environmental legislation.
- Develop a culture of collective responsibility and sustainability.

### You won't

- Ignore responsible business practices or your impact on society and the environment.

## Human rights, right to work, modern slavery

Treat people fairly and with respect and dignity.

### You will always

- Read and fully comply with Robertson policies and process regarding Human Rights, Right to Work and Modern Slavery.
- Refuse to tolerate any unacceptable treatment of individuals such as mental cruelty, sexual harassment or discrimination.
- Provide equal opportunities for all.

### You won't

- Fail to comply with Robertson policies and process to safeguard human rights.
- Engage in any activities that encourage human rights abuses.

## Our 2030 Responsible Business strategy

Being socially, economically and environmentally responsible in all that we do is crucial to the success we have achieved to date, and to the continued sustainability of our business. Our 2030 Responsible Business strategy has three core themes, each aligned to UN Sustainable Development Goals:

**Our People:** By 2030 we will have enhanced the lives of 10,000 people, by creating work placements and job opportunities, and by supporting apprenticeships, upskilling and new qualifications.

**Our Partners:** By 2030 we will have created £1 billion of social value, by enhancing lives and spending locally in the areas where our projects are and with social enterprises, microbusinesses and SMEs.

**Our Planet:** By 2030 we will move beyond being a carbon neutral business to become 'climate positive', generating zero emissions from our offices, commercial fleet and construction sites within our operational control. We will, create a net biodiversity gain on our projects and become carbon positive without increasing our offsetting.



## We are determined to succeed

Every challenge is an opportunity. We work collaboratively and focus on safety, productivity and quality to find solutions we can be proud of and that provide a positive, lasting benefit.

**We are trusted to:** achieve the right outcomes and make a positive difference for our customers, stakeholders and communities.

### Performance

Strive to excel at what you do as an individual and as a business, to deliver the best experience and project outcomes for our customers.

#### You will always

- Understand the importance of following processes and procedures.
- Consistently deliver on agreed responsibilities and objectives, even in challenging circumstances.
- Recommend only products, services and solutions that are the right fit for your customer's needs.

#### You won't

- Fail to review quality of work and progress against key performance indicators.
- Ignore requests or concerns from employees, Robertson and our customers and partners.
- Show reluctance to see change as positive and resist trying new things.

### Relationships

Maintain high-quality professional relationships and be thoughtful, fair and honest in your interactions.

#### You will always

- Understand and build effective professional relationships with Robertson and our customers to meet their needs.
- Work collaboratively to develop joint solutions.
- Report or challenge unethical conduct at work.

#### You won't

- Exhibit unethical conduct or behaviour that could potentially damage a business relationship.

### Innovation

Encourage a culture of innovation, allowing people to consider and make improvements that really make an impact.

#### You will always

- Approach change positively, taking time to understand why it's needed and the benefits.
- Search for realistic solutions instead of focusing on the problem.
- Look for ways to trial fresh approaches and improve how things are done.

#### You won't

- Dismiss ideas for improvement or challenge them in an unhelpful way.
- Focus on firefighting rather than look for a long-term solution.

## We are one team

We work as one – in our teams and partnerships, and with our customers. We respect each contribution, and everyone stands up to be counted. We are Team Robertson.

**We are trusted to** encourage and practice teamwork, and work towards our shared goal.

### Ambassador

Make a positive impact with every customer by being an ambassador for Robertson and your business.

#### You will always

- Positively represent the Robertson supply chain.
- Work to the highest standards and embody the Robertson principles as you go about your work.

#### You won't

- Avoid opportunities for cross-team working.

### Collaborative working

Work together to jointly achieve positive outcomes for our customers and communities.

#### You will always

- Value your team and commit to achieving shared objectives.
- Keep your mind open to alternatives.
- Work in consensus to solve problems.

#### You won't

- Keep information to yourself if it is of mutual benefit.

### Bullying

Everyone should feel safe, protected and allowed to achieve their best at work.

#### You will always

- Communicate responsibly.
- Support a working environment free from harassment or abusive conduct.
- Report harassment you see, experience or suspect.

#### You won't

- Tolerate any kind of harassment in the workplace – verbal, physical, visual or sexual.
- Single out anyone for negative treatment.
- Make non-constructive comments that demotivate the people around you.

### Diversity

Promote a diverse, inclusive and fair workplace.

#### You will always

- Treat everyone at work with respect and dignity.
- Work collaboratively and in a respectful manner both within your team and the wider site team.

#### You won't

- Let individual differences negatively impact team morale.
- Practice any form of discrimination based on race, colour, age, disability and sexual orientation among others.

# Raising concerns



## How to raise a concern

It is the responsibility of everyone involved in a Robertson project to speak up if they have genuine concerns, or suspect cover up, relating to: criminal activity, breach of a legal obligation (including negligence, breach of contract, breach of administrative law), miscarriage of justice, danger to health and safety or the environment.

Please raise any issues where you believe the Robertson Way is not being followed, by emailing us at one of the addresses below or speaking directly with the Project Manager.

Safety, Health and Environment:  
[shehelpline@robertson.co.uk](mailto:shehelpline@robertson.co.uk)

Supply Chain:  
[supply.chain@robertson.co.uk](mailto:supply.chain@robertson.co.uk)

Responsible Business (Sustainability):  
[responsiblebusiness@robertson.co.uk](mailto:responsiblebusiness@robertson.co.uk)

## Read our policies

- Responsible Business policy – [summary film](#)
- [Modern slavery statement](#)
- [Whistleblowing policy](#)

## Our commitment

Robertson is committed to ensuring that any concerns of this nature will be taken seriously and investigated. A disclosure to the Company will be protected if the individual has an honest and reasonable suspicion that malpractice has occurred, is occurring or is likely to occur. Individuals who raise concerns responsibly will not be penalised in any way.

To ensure this policy is adhered to, and to assure individuals that the concern will be taken seriously, Robertson will:

- Not allow the person raising the concern to be victimised for doing so.
- Treat victimisation of whistle-blowers as a serious matter that may lead to disciplinary action that can include dismissal.
- Not attempt to conceal evidence of poor or unacceptable practice.
- Take disciplinary action if an employee destroys or conceals evidence of poor or unacceptable practice or misconduct.
- Ensure confidentiality clauses in employment contracts do not restrict, forbid or penalise whistle blowing.
- Liaise with the Health & Safety Executive, Criminal Records Bureau, Audit Scotland and other external organisations to whom employees may report malpractice.

Thank you for committing  
to work the Robertson Way.

