



Ethics

Commitment

- The Group is committed to promoting the highest standards of ethical behaviour and requires all staff to act in accordance with its ethical principles.
- We prohibit staff from offering, giving, soliciting or accepting any bribe (cash or other inducement) or facilitation payment, or from engaging in any corrupt practice.
- We prohibit the payment of donations to political parties or charities to obtain a business advantage.
- We obey the law and respect the customs and culture of the countries in which we work and comply with national and international trade restrictions.
- Adhering to this policy is a condition of employment. Any breach of this policy will result in dismissal, unless personal safety or liberty is under threat.

Responsibility

- The Group chairman is responsible for this policy and for its effective implementation.
- The Group business management systems and risk director is responsible for providing a framework for implementing this policy.
- General managers ensure we meet our ethical standards on a day-to-day basis and are responsible for monitoring and reviewing their implementation.
- Project principals are responsible for incorporating ethical standards in projects.
- All staff are responsible for meeting our ethical standards. Our global collegiate approach supports the Group in maintaining standards and enables us to better meet those expected by our clients.

Approach

- We operate a business management system which is certificated to BS 10500.

- We seek and establish relationships with suppliers, subcontractors and other business partners based on mutual respect and good governance.
- We carry out due diligence to evaluate the ethics of clients, suppliers, subcontractors and other business partners and withdraw from contracts when unethical business practices become apparent.
- We monitor the conduct of independent agents to ensure compliance with our policies and practices. Agents' remuneration is always proper, appropriate and justifiable, at market value.
- All staff are given training on the Group's ethics policies and procedures as part of the induction process and throughout their employment.
- While business entertainment and gifts can generate goodwill and improve working relationships, all staff must avoid situations that could interfere, or appear to interfere, with the impartial discharge of the Group's duties.
- All staff must resolve conflicts of interest. We do not permit the use of business facilities or information for personal gain.
- We encourage staff to raise concerns, without fear of reprisal, and provide a number of communications channels, including a confidential helpline.
- We are committed to making our communications, marketing and publications factually correct, ethical and fair. We compete vigorously but do not seek to misrepresent our competitors.

A handwritten signature in black ink that reads 'K. S. Howells'.

Keith Howells
Chairman