



# Business integrity

## Purpose

This policy sets out our commitment to behaving ethically and maintaining the highest standards of integrity in the conduct of our business.

## Commitment

The Group is committed to behaving ethically in all that we do. This is reflected in Our Code and Delivering with PRIDE, and is reinforced through our PRIDE values of Progress, Respect, Integrity, Drive, and Excellence.

We are committed to business practices that are responsible, fair, and promote the highest standards of integrity. To achieve this, we comply with all legal and regulatory requirements and respect the customs and cultures of the countries we operate in.

We are committed to countering all forms of bribery and corruption and prohibit the giving or receiving of bribes, including facilitation payments and gifts or hospitality that may improperly influence business decisions. We work to continually improve our anti-bribery systems and practices.

We prohibit the payment of donations to political parties or charities to obtain a business advantage.

We protect the integrity of our operations by ensuring decisions are made in the best interests of Mott MacDonald and are not influenced by other external interests.

We respect and abide by national and international trade laws, including economic sanctions, anti-boycott provisions, and import and export controls.

We compete fairly, respecting the laws and ethical practices of the jurisdictions in which we work.

Adhering to this policy is a condition of employment and breaches will result in disciplinary action.

We recognize that our clients, suppliers, and partners are essential to the long-term success, resilience, and sustainability of our business. We are therefore committed to working only with those who operate in a way that is consistent with Our Code and PRIDE values and can meet the standards set out in this policy.

## Responsibility

The Executive Chair is responsible for this policy and for its effective implementation.

The Group ethics and compliance officer shall have the authority and independence to design systems and frameworks to implement this policy. The Group ethics and compliance officer shall provide guidance and advice on issues within the scope of this policy and report on performance to the Executive Board.

General managers ensure we meet our standards of integrity on a day-to-day basis and are responsible for monitoring and reviewing their implementation.

Project principals are responsible for assessing and treating risks relating to our standards of integrity within their projects.

All of us are responsible for ensuring we behave ethically, meeting our standards of integrity, and promoting Our Code and our PRIDE values.



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## Approach

Our relationships with suppliers, subcontractors, and other business partners are based on mutual respect and good governance.

We carry out due diligence to evaluate the bribery risk and integrity standards of clients, suppliers, subcontractors, and other business partners and will withdraw from contracts when unethical business practices are suspected — we seek clauses in our contracts which permit us to do this.

We monitor the conduct of independent agents to ensure compliance with our policies. Agents' remuneration is always appropriate for the work they do and is justifiable at market value.

Our business management system is certified to ISO 37001 anti-bribery management quality standard.

We all receive training on Our Code, Delivering with PRIDE, and the Group's Business Integrity policy and supporting processes as part of induction and throughout our employment.

While business entertainment and gifts can generate goodwill and improve working relationships, we avoid situations that could interfere, or appear to interfere, with the impartial discharge of the Group's duties. Where gifts and hospitality are given and received, this is done openly and transparently. We take great care when considering providing gifts or hospitality to government officials to ensure we do not breach their working regulations.

We identify and manage actual, potential, and perceived conflicts of interest as soon as they arise.

We encourage colleagues to seek help and advice from line management if they suspect Our Code and values are being breached and provide confidential resources to report concerns when violations occur.

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 blue ink, appearing to read 'M. C. Isola'.

Michael C. Isola  
President and CEO  
Mott MacDonald North America