

# **Ethics**

#### Commitment

The Group is committed to promoting the highest standards of ethical behaviour and requires all of us to act in accordance with its ethical principles. We support the proactive position our clients take on assignment delivery with good business ethics.

We are prohibited 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.

We work to continually improve our anti-bribery systems and practices.

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.

We are committed to achieving these standards with our supply chain.

### Responsibility

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

The Group business management systems principal 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 assessing and treating the bribery risk of their projects.

All of us are responsible for meeting our ethical standards.



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### **Approach**

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

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

We carry out due diligence to evaluate the bribery risk and ethics 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.

All of us are given training on the Group's ethics policies and processes as part of their induction on joining and throughout their employment. While business entertainment and gifts can generate goodwill and improve working relationships, we employees must all avoid situations that could interfere, or appear to interfere, with the impartial discharge of the Group's duties. We take great care when considering providing gifts or hospitality to government officials to ensure we do not breach their working regulations.

We must report conflicts of interest as soon as they arise.

We encourage colleagues to raise concerns either with line managers or through a Speak Up facility which is independently managed and confidential.

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

Mike Haigh Executive Chair

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