



# Ethics

## Purpose

This policy sets out our commitment to maintaining the highest ethical standards in the conduct of our business.

## Commitment

The Group is committed to promoting the highest standards of ethical behaviour in all that we do. This is reflected in our PRIDE values of Progress, Respect, Integrity, Drive and Excellence.

We are committed to providing a working environment underpinned by our values, where everyone who works for or with us respects the values we live by.

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 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 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 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 are committed to achieving these standards within our supply chain and working with partners and clients who share our ethical standards.

## Responsibility

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

The Group ethics and compliance officer is responsible for providing an independent 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 ethics risks within their projects.

All of us are responsible for meeting our ethical standards and for promoting our PRIDE values.



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## Approach

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.

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

We all receive training on the Group's ethics policies and 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. 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 and suspected conflicts of interest as soon as they arise.

We encourage colleagues to seek help and advice from line management if they suspect our ethical standards 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 black ink, appearing to read 'M Haigh'.

**Mike Haigh**  
Executive Chair