

ANTI-BRIBERY AND CORRUPTION POLICY

COWI UK Ltd is a company of consulting civil and structural engineers, specialising in bridges, tunnel and marine projects. We undertake projects at our offices in Bristol, Derby, Glasgow, Hong Kong, London and York, with our business support division located in Uttoxeter. We are a subsidiary of the COWI Group.

We acknowledge our statutory obligations with regards to anti-bribery and corruption regulations. We have a duty to ensure that the company's business is conducted in an ethical manner and are committed to the highest standards in business. We value our reputation for ethical behaviour, financial probity and reliability.

We recognise that over and above the commission of any crime, any involvement in bribery will also reflect adversely on our image and reputation. The aim of this policy is to limit the company's exposure to bribery by:

- > Setting out a clear anti-bribery policy
- > Training all employees so that they can recognise and avoid the use of bribery by themselves and others
- > Encouraging our employees to be vigilant and to report any suspicion of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately
- > Rigorously investigating instances of alleged bribery and assisting the police and other appropriate authorities in any resultant investigation and prosecution
- > Taking firm and vigorous action against any individual(s) involved in bribery
- > Taking a zero tolerance approach to bribery and corruption.

THE POLICY

We prohibit the offering, the giving, the solicitation or the acceptance of any bribe, whether cash, gifts, hospitality, facilitation payments, political or charitable contributions or other inducement to or from any person or company, wherever they are situated and whether they are a public official or body or private person or company by any individual employee, agent or other person or body acting on the company's behalf.

KEY ANTI-BRIBERY AND CORRUPTION PRINCIPLES:

- > We will carry out our business honestly, fairly and with integrity
- > We will not give or offer any money, gift or hospitality to any person or any third party associated with that person to get them to do something improper
- > We will not use any third parties for the means of committing bribery
- > We will seek to gain assurance from those with whom we do business that they commit to the same principles
- > No employee will suffer demotion or penalty for refusing to offer bribes or for reporting any illegal activity they become aware of
- > Any employee found in breach of these rules shall be subject to disciplinary action.

FURTHER CLARIFICATION

We recognise that market practice varies across the territories in which we do business and what is normal and acceptable in one place may not be in another. This policy prohibits any inducement which results in a personal gain or advantage to the recipient or any person or body associated with them, and which is intended to influence them to take action which may not be solely in the interests of COWI UK Ltd or of the person or body employing them or whom they represent.

This policy is not meant to prohibit the following practices providing they are customary in a particular market, are proportionate and are properly recorded.

- > Normal and appropriate hospitality
- > The giving of a ceremonial gift on a festival or at another special time
- > The use of any recognised fast-track process which is available to all on payment of a fee
- > The offer of resources to assist the person or body to make the decision more efficiently provided that they are supplied for that purpose only.

Inevitably, decisions as to what is acceptable may not always be easy. If anyone is in doubt as to whether a potential act constitutes bribery, the matter should be referred to the local senior manager with responsibility for this policy before proceeding. If necessary, guidance should be sought from a Director.

If it is not appropriate to decline the offer of a gift, the gift may be accepted, provided it is then declared to a Director and donated to charity. We only make charitable donations that are legal and ethical under local laws and practices and are approved by a Director.

ACCOUNTABILITY AND RESPONSIBILITY

The Board of Directors is ultimately responsible for setting ethical, legal and moral standards with regards to anti-bribery and corruption.

The Directors are responsible for raising any breach of the anti-bribery and corruption policy to the attention of the Board of Directors for action.

The Directors are responsible for establishing suitable channels of communication by which employees or others can report confidentially any suspicion of bribery.

ALL EMPLOYEES HAVE A RESPONSIBILITY:

- > For the prevention, detection and reporting of acts of bribery or corruption
- > To avoid any activity that might lead to, or suggest, a breach of this policy
- > To notify your line manager / Director if you believe or suspect that a conflict with or breach of this policy has occurred, or may occur in the future
- > To co-operate with the company and undertake the required training

- > To help implement this policy.

Signed: _____

Lars Hauge
Managing Director
COWI UK Ltd
08/02/2018

