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Scope of Policy

At Cundall, we believe in running and developing our business in a sustainable way, for the benefit of those who work in it. We believe that our business interests are best served by behaving responsibly towards all of our stakeholders; clients, staff, suppliers and the communities in which we operate.

We believe that we have a responsibility to adhere to the highest standards of behaviour and care. As an international business, we recognise that laws vary from country to country. Compliance with those laws is necessary, but never sufficient. Our Ethical Business Policy therefore sets out the universal standards of individual and collective behaviour that we seek to apply to all of our activities around the world.

The general principles which underpin this policy align with our corporate values; we are Committed, Expert, Passionate, Responsible and Supportive. Therefore, we will:-

- Treat staff fairly and with respect for their dignity.
- Implement policies and procedures to prevent slavery and human trafficking in all parts of our business, and within our supply chain.
- Deal with clients with integrity, offering good value, high quality advice and prompt redress if something goes wrong.
- Embrace the aspirations of our clients and the design team, making positive, enthusiastic and timely contributions and deploying the best available expertise in the design process.
- Conduct our relationships with suppliers with honesty, fairness and mutual trust.
- Be fair and honest in our dealings with Contractors, select them objectively and administer their contracts judiciously.
- Always specify products for projects rationally, acting solely in the client's interest, in a way that is auditable.
- Comply fully with our legal obligations and aim to make a positive contribution to the sustainable development of the communities in which we work.
- Monitor ethical performance and produce regular reports giving a true and fair view of our affairs.

This policy aims to outline *how* we do business. We recognise that it would be impossible to produce a comprehensive set of rules that cover every situation that our people might encounter in the course of their work. Instead, this policy seeks to provide the framework within which we expect our people to operate, and some guidelines as to what may or may not be acceptable. Where a particular activity is clearly at odds with our ethics as an organisation and is deemed to be unacceptable in any circumstances, this is made clear in this policy. As a general rule, we expect people to make sensible and informed judgements about whether a particular activity, approach or way of working is ethical and likely to be acceptable to the Practice, and to seek guidance from others within the Practice as required where they are unsure. This policy should be read in conjunction with the Practice's specific policies on:-

- Health, Safety and Welfare
- The Environment

- Diversity
- Equal Opportunities

International Operations

Cundall does business globally, and our employees are subject to the laws and regulations of different countries, and of organisations such as the European Union. Each of us is responsible for knowing and following the laws that apply to us where we work.

This policy establishes principles for business conduct applicable throughout the Practice, regardless of geographical location. Where differences exist as a result of local customs, norms, laws or regulations, members of the Practice are expected to adhere to the principles and spirit of this policy and with local requirements.

Bribery and Corruption

The Bribery Act 2010 (the 'Act') was enacted on 8 April 2010 and its main provisions commence in July 2011. Under the Act, the main offences are bribing another person, being bribed, bribing a foreign official, and a corporate offence of failing to prevent bribery.

As a result of this Act, certain actions abroad, which were acceptable business practice, will now constitute offences in the UK if the person performing them abroad has a close connection to the UK or if the related corporate body is incorporated in the UK or carries out part of its business in the UK.

Further, these offences will be judged according to an "expectation test", which is what would the reasonable person in the UK expect in relation to the performance of the activity concerned (that is, not what behaviour is common in the place where the activity has taken place).

Anti bribery and anti corruption laws apply to all Cundall employees worldwide, and any bribery or corruption is always contrary to Cundall's own standards of business conduct. Cundall employees must not under any circumstances make or accept any offers of bribery (this is widely defined and includes offers of services, money, gifts or entertainment). If you are in any doubt regarding this, you should speak to a member of the Management Board. Any actual or suspected bribery must be reported to a member of the Management Board.

Any employee who is suspected to have breached our policy in this regard will be subject to a disciplinary investigation, which may lead to their dismissal from their employment.

Any report by an employee of actual or suspected bribery will be treated in confidence and (provided that any such report is made in good faith in support of Cundall's commitment to zero tolerance towards bribery and corruption), the employee shall be protected from any reprisals in connection with their report.

Child or Forced Labour

In some of the countries in which the Practice operates, child or forced labour may be an issue. Cundall is committed to the elimination of all forms of forced and compulsory labour, and to the effective elimination of child labour. Each Cundall employee is expected to be aware of and abide by these commitments, and to never personally hire child or forced labour. Employees should also be alert to any evidence of child or forced labour in operations linked to the Practice, and report them to the Management Board.

Anti Collusion

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Cundall will not collude with others (including contractors, suppliers or service providers) in the pricing or submission of tenders or services, nor will Cundall enter into any agreement with any other person or body that they shall refrain from participating in any competitive tender, submission or pre-qualification process.

Gifts and Entertainment

The exchange of gifts and entertainment can build goodwill in business relationships, but can also create improper influence or the appearance of improper influence. The Practice therefore provides detailed guidance for managers and staff, to help them determine whether gifts may be accepted.

Supervision of Others

Those who supervise others have additional responsibilities for maintaining compliance with this policy. They must:-

- Lead by example, promoting compliance and ethics in all of their behaviours.
- Make sure that those who report to them understand the requirements of this policy and have the resources to meet them.
- Monitor compliance and ethics within their team(s), and take appropriate action to address any shortcomings.
- Use reasonable care to monitor the behaviour of third parties acting on behalf of the Practice to ensure that they behave in an ethical manner.
- Support employees who, in good faith, raise questions or concerns about ethical issues within the Practice.

Personal Responsibility

Everyone who works within the Practice has a responsibility to comply with the letter and the spirit of this policy, and to bring to the attention of management any suspected breach of the policy by another member of the practice. In considering whether to speak up about a suspected breach, employees should ask themselves some simple questions:-

- Is the action legal?
- Does it comply with Cundall's Ethical Business Policy?
- Is it in line with Cundall's values?
- Does it expose the Practice to any unacceptable risks?
- Does it match the commitments and guarantees that we have made to others?
- How would it look if reported in the newspapers?
- Does it feel right?

As well as compliance with the policy, members of the Practice are expected to exercise good judgement and common sense, so that their actions never jeopardise our reputation as a responsible business.

