

# Ethical and anti-corruption policy

We insist on honesty, integrity and fairness in all aspects of our business, and we expect the same of those we do business for and with globally.

- We observe all applicable laws and regulations relevant to countering bribery and corruption in all the countries in which we operate.
- We must also ensure compliance by all our employees and other members of staff in every part of the world in which we operate, including agency workers, consultants, independent contractors and secondees (collectively “employees”) with the UK’s anti-bribery and corruption laws (many of which have effect outside the UK) and equivalent laws in the applicable countries.
- Our employees are expected to act lawfully, in a professional manner and with the utmost integrity courtesy and respect in their dealings with our clients, competitors, suppliers, the community and each other, striving at all times to enhance the reputation and performance of the Company. They must respect the dignity and human rights of colleagues and the people that we do business with and observe obligations of confidentiality at all times.
- All business transactions on behalf of HR Wallingford must be reflected accurately and fairly in the accounts of the Company in accordance with established procedures and are subject to audit.
- We avoid conflicts of interest in the services we provide to our clients. Our employees do not accept or give gifts or hospitality of significant value in any form.
- Our employees must avoid conflicts of interest between their private financial activities and their part in the conduct of HR Wallingford’s business.
- We take malpractice and dishonesty very seriously. Employees and any associated third parties are encouraged to report any wrong doing by the Company or its employees that falls short of our business policies and principles.
- We have zero tolerance to tax evasion and we are committed to preventing the involvement of those acting on our behalf in the criminal facilitation of tax evasion.

HR Wallingford will not tolerate any form of corruption or bribery or tax evasion. This policy applies to all the Company’s business dealings and transactions in all countries in which it or its subsidiaries and associates operate. Where this policy is shared externally with any third party, it will be applicable to that third party entity and its representatives, shareholders, directors and employees.

Specifically no employee may:

- give, promise, offer or accept a bribe;
- make or offer a bribe either directly or through any third party;
- make or offer any kind of facilitation payment either directly or through any third party;

- offer or accept receipt of gifts, hospitality or expenses where this affects or could be perceived to affect the outcome of a business transaction and are not reasonable or bona fide; or
- engage in any activity which is designed to facilitate tax evasion.

Employees must:

- ensure third parties including sub-contractors, joint venture partners, agents or intermediaries do not make prohibited payments on our behalf and ensure that these third parties are bound contractually to meet the requirements of this policy;
- observe our rules on giving and receiving gifts and hospitality;
- report any conduct that is observed and may be considered to breach any anti-corruption laws in complete confidence to the Chief Financial Officer, Head of Legal or the Chair of the Board of Directors of HR Wallingford Group Limited.

An employee should raise any queries about the application of this policy with the Chief Financial Officer or Head of Legal in advance of any action. We support all employees who report apparent misconduct honestly and in good faith and do not tolerate any retaliation against that employee. Any manager or employee found to have retaliated against someone who has raised a concern in good faith will face disciplinary action, which could include dismissal. The “Whistleblowing Policy” (PO-034) will apply to any disclosure or report made pursuant to this Policy.

This ethical and anti-corruption policy is communicated to all employees via the company intranet. New employees are introduced to the policy on induction and are referred to the detailed guidance that is to be read together with this policy. We will run regular update training in respect of this Policy and the related guidance for employees. This policy may be shared with third parties via email or by other agreed methods.

Breach of this policy by persons with whom we have business dealings may result in contractual redress and will result in termination of contractual arrangements. Breach of this policy by employees may result in disciplinary action up to and including dismissal and being reported to the relevant authorities.

**Ridha Bentiba**  
Executive Director, HR Wallingford Ltd

Signed:



Date: 17 April 2025

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