

Halcrow Group Limited

Elms House 43 Brook Green London W6 7EF
Tel +44 (0)20 3479 8000 Fax +44 (0)20 3479 8001
halcrow.com



November 2011

BUSINESS INTEGRITY

Statement of Policy

Halcrow is committed to ensuring that its activities reflect its ethical values of honesty, fairness and transparency. The company will not tolerate corruption, bribery and unfair, anti-competitive activity, and insists on integrity in all aspects of its business and from all those it does business with.

Halcrow recognises the threat that bribery and corruption pose to economic progress and development in the countries in which it operates, and is committed to complying with the requirements of the relevant laws of those countries, as well as relevant cross-boundary legislation.

Halcrow forbids the payment and receiving of bribes on its behalf, and will maintain an adequate system of procedures designed to prevent bribery by any person associated with the company.

Clients and business partners

Ethical basis of Halcrow's relationships

Halcrow will work for clients and with business partners that comply with internationally acceptable ethical standards, and where its commissions are consistent with generally accepted ethical standards. Halcrow will not undertake or support any form of commission known to be breaching, as a policy or strategy, the generally accepted ethical standards of its home country or the country in which it is operating.

Transparency

Halcrow will conduct relationships with clients and business partners in the spirit of transparency, openness and trust, albeit with due regard to considerations of commercial or personal confidentiality. Halcrow does not permit the establishment or maintenance of any undisclosed or unrecorded account, fund or asset, and insists that proper and full records must be made of all transactions on behalf of the company.

Halcrow employees

Bribery

Halcrow employees shall act in an ethical, honest and professional way in all of their business dealings, and may not offer, give or receive any gift or payment which is, or may be construed as, a bribe. Any demand for, or offer of, a bribe or inducement to act in any way contrary to our principles must be rejected immediately.

This policy first signed December 2010

Halcrow Group Limited is a CH2M HILL company
Registered office: Elms House, 43 Brook Green, London W6 7EF. Registered in England and Wales. Registered number 3415971

Corporate gifts and hospitality

Whilst recognising that corporate hospitality is frequently given and received as part of the development of legitimate and mutually beneficial relationships, Halcrow will not condone the giving or receiving of gifts, hospitality or favours that could be interpreted as an attempt at bribery. Halcrow employees shall avoid accepting gifts, hospitality or favours which might appear to place them under any obligation.

Conflict of interest

Halcrow employees are required to avoid any contact that might lead to, or suggest, a conflict of interest between their personal activities and the business of Halcrow or its clients. All employees are required to disclose family links or other close relationships with a relevant decision-maker in a client, supplier or competitor organisation; financial interests in a client, supplier or competitor organisation; and activities on behalf of a client or another in such a way that the trust vested in Halcrow by a third party (client or other business partner) may be abused.

Violations

Halcrow requires all employees to report promptly to the company any violations of law or company policies that come to their attention and to co-operate fully in any audit, enquiry, review or investigation by the company. Halcrow will maintain secure reporting systems to enable such reports to be made in confidence.

Employee awareness

Halcrow will ensure that its employees are aware of the company's business principles and this business integrity policy. Employees will receive guidance and supervision on ethical behaviour and legal compliance relevant to their role, and their knowledge and understanding will be regularly assessed. Ultimately, if employees fail to comply with this policy, they are liable to disciplinary action, up to, and including, dismissal.



Greg McIntyre
Managing director