
GLOBAL ANTI–BRIBERY & ANTI–CORRUPTION STATEMENT

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1. PURPOSE AND COMMITMENT

Engineering Projects TM LTD ("EPTM LTD", "the Company", "we", "us" or "our") is committed to conducting its business with honesty, integrity, transparency and professionalism.

EPTM LTD has zero tolerance for bribery, corruption, fraud, improper influence or other forms of unethical business conduct.

We expect our directors, officers, employees, consultants, contractors, professional advisers, representatives, agents, intermediaries, suppliers, business partners and other persons acting for or on behalf of EPTM LTD to uphold these standards.

EPTM LTD will not seek, obtain or retain business or any other advantage through bribery or improper conduct.

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2. LEGAL AND INTERNATIONAL FRAMEWORK

EPTM LTD's principal legal framework is the law of the United Kingdom, including the **Bribery Act 2010**, together with other applicable UK legislation and regulatory requirements.

The Bribery Act 2010 establishes offences including offering, promising or giving a bribe; requesting, agreeing to receive or accepting a bribe; bribery of a foreign public official; and, for relevant commercial organisations, failure to prevent bribery by associated persons.

Where EPTM LTD operates, provides services or enters into business relationships outside the United Kingdom, we also seek to comply with applicable mandatory anti–bribery, anti–corruption, public–sector integrity, procurement, accounting and economic–crime laws of those jurisdictions.

Where applicable local law imposes a higher or additional requirement, EPTM LTD will comply with that mandatory requirement.

Nothing in this Statement is intended to restrict compliance with any applicable law.

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3. WHAT EPTM LTD PROHIBITS

EPTM LTD prohibits directly or indirectly:

- offering, promising, giving or authorising a bribe;
- requesting, agreeing to receive or accepting a bribe;
- offering or accepting an improper financial or other advantage;
- attempting to improperly influence a person or decision;
- making payments or providing benefits intended to obtain an improper business advantage;
- using a third party to do something that EPTM LTD or its personnel could not properly do themselves;

- concealing or disguising an improper payment or benefit;
- falsifying, manipulating or concealing business records;
- engaging in corrupt procurement, tendering or contracting practices; and
- retaliating against a person who raises a genuine concern about bribery or corruption.

These requirements apply regardless of whether the conduct occurs in the United Kingdom or elsewhere.

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4. GIFTS AND HOSPITALITY

Reasonable and legitimate business hospitality may be appropriate in some circumstances.

However, gifts, hospitality, entertainment, travel, meals, invitations or other benefits must never be offered or accepted:

- to influence a business decision improperly;
- to secure an improper advantage;
- in exchange for preferential treatment;
- during a sensitive tender, procurement or approval process where doing so could improperly influence the decision;
- where the benefit would create an actual or perceived obligation; or
- where it would breach applicable law or professional requirements.

EPTM LTD expects gifts and hospitality to be reasonable, proportionate, transparent and connected to a legitimate business purpose.

Internal Approval and Recording Controls

EPTM LTD does not treat any monetary value as automatically permissible or as a safe harbour from anti–bribery requirements.

Gifts and hospitality must be assessed according to their nature, purpose, circumstances, frequency, recipient, relationship to any business decision and applicable law.

Where a gift or hospitality presents a material, unusual, repeated or potentially sensitive risk, prior written approval from EPTM LTD management must be obtained where practicable and the relevant arrangement must be appropriately recorded.

Gifts or hospitality involving public officials, persons exercising public functions, government procurement, regulatory approvals, planning, permitting, inspections, tenders or other official decisions require heightened scrutiny and, where appropriate, prior written approval from a Company Director.

Cash or cash equivalents must not be offered or accepted.

Gifts or hospitality must not be divided, structured or repeated for the purpose of avoiding applicable approval or recording requirements.

Where applicable local law, professional requirements or the recipient's applicable rules impose a stricter limitation or prohibition, the stricter requirement applies.

All required approvals and related expenditure must be accurately recorded.

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5. FACILITATION PAYMENTS

EPTM LTD does not permit facilitation payments.

A facilitation payment is generally a payment made to secure or accelerate a routine governmental action to which the payer is otherwise entitled.

Where a person is threatened, coerced or placed in immediate danger, personal safety takes priority. Any such circumstance must be reported to EPTM LTD as soon as reasonably practicable and the circumstances and any payment must be accurately recorded.

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6. PUBLIC OFFICIALS

EPTM LTD applies particular care when dealing with government officials, public authorities, state–owned or state–controlled entities and other persons exercising public functions.

No employee, representative or associated person may provide an improper payment, gift, hospitality, favour or other advantage to influence an official decision or obtain an improper business advantage.

All dealings with public officials must be lawful, transparent and professionally appropriate.

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7. THIRD PARTIES AND BUSINESS ASSOCIATES

EPTM LTD recognises that bribery risks may arise through persons performing services for or on behalf of the Company.

Accordingly, EPTM LTD takes a proportionate, risk–based approach to third–party relationships.

Depending on the circumstances and risk, EPTM LTD may conduct appropriate due diligence before or during relationships with:

- consultants;
- contractors;
- agents;
- intermediaries;
- professional advisers;
- suppliers;
- subcontractors;
- joint–venture or business partners; and
- other persons acting for or on behalf of EPTM LTD.

Third–Party Due–Diligence Controls

Before engaging a third party where anti–bribery risk warrants review, EPTM LTD will, proportionate to the circumstances:

1. **Identify the party** and obtain appropriate basic information concerning its legal identity, ownership or control and proposed role.
2. **Assess the relationship risk**, including the services involved, jurisdiction, payment structure, interaction with public officials and other relevant risk indicators.
3. **Check integrity and reputation**, where proportionate, including available adverse information, sanctions or regulatory concerns relevant to the proposed relationship.
4. **Assess remuneration**, commissions, fees and expenses to confirm that they are legitimate, commercially reasonable, proportionate to the services and properly documented.
5. **Obtain appropriate supporting information** where enhanced review is warranted.
6. **Obtain appropriate approval before engagement** based on the assessed risk.
7. **Include suitable contractual anti–bribery requirements** where appropriate to the relationship.
8. **Maintain proportionate records** of the review, decision and relevant approvals.

Risk–Based Approval

- **Low risk:** proportionate basic due diligence and management approval.
- **Medium risk:** enhanced due diligence as appropriate and written management approval before engagement.
- **High risk:** enhanced due diligence and **prior written approval by a Company Director** before engagement or payment where practicable.

High–risk indicators may include government–facing intermediaries, significant interaction with public officials, high–risk jurisdictions, unusual commissions or payment arrangements, unexplained ownership, material adverse information or other credible corruption indicators.

No person may deliberately bypass, split or restructure an arrangement to avoid required due diligence or approval. Third–party remuneration must be paid through appropriate and traceable channels and must correspond to legitimate services actually provided.
EPTM LTD expects such persons to comply with applicable anti–bribery and anti–corruption laws and with contractual requirements imposed by EPTM LTD. EPTM LTD will not knowingly use a third party to circumvent its anti–bribery requirements.

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8. CONFLICTS OF INTEREST

Actual, potential or perceived conflicts of interest must be handled openly and appropriately.

Personnel and associated persons should disclose relevant conflicts where their personal, financial, family, professional or other interests could improperly influence, or reasonably appear to influence, their EPTM LTD responsibilities or business decisions.

EPTM LTD will take proportionate steps to manage identified conflicts.

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9. PROCUREMENT, TENDERING AND CONTRACTING

EPTM LTD is committed to fair, transparent and professional procurement and tendering practices.

EPTM LTD will not seek an improper advantage through:

- bribery;
- undisclosed inducements;
- improper payments;
- manipulation of tender processes;
- improper sharing or obtaining of confidential tender information;
- collusion;
- fraudulent documentation; or
- other corrupt practices.

Commercial decisions should be based on legitimate business, technical, professional and contractual considerations.

Where practicable and proportionate, material procurement and appointment decisions should be supported by appropriate evaluations, approvals and records.

10. FINANCIAL RECORDS AND BUSINESS RECORDS

EPTM LTD is committed to maintaining accurate and appropriately detailed books, records and supporting documentation.

No person acting for or on behalf of EPTM LTD may create, approve or maintain a false, misleading, incomplete or deliberately concealed record relating to a payment, expense, transaction, contract, commission, gift, hospitality or other business activity.

Payments and expenses must have a legitimate business purpose and appropriate supporting documentation.

Required approvals must be obtained before commitments or payments are made where applicable.

Payments must not be routed through undisclosed recipients, personal accounts or unusual channels where doing so would conceal the true recipient, purpose or nature of the transaction.

11. CHARITABLE AND POLITICAL CONTRIBUTIONS

EPTM LTD does not use charitable donations, sponsorships or other contributions as a means of obtaining an improper business advantage.

Any charitable, sponsorship or similar contribution made on behalf of EPTM LTD must have a legitimate purpose and comply with applicable law and Company requirements.

EPTM LTD does not make political contributions where prohibited by law and will not use political contributions or activities to obtain improper commercial advantages.

12. REPORTING CONCERNS

EPTM LTD encourages anyone who becomes aware of, or reasonably suspects, bribery, corruption or other serious misconduct connected with EPTM LTD to raise the concern promptly.

Official Reporting Channel

Concerns may be submitted through the EPTM LTD official Contact page and secure contact forms.

Where appropriate, a concern may also be raised directly with EPTM LTD management or a Company Director.

Reports may include concerns relating to:

- actual or suspected bribery;
- improper gifts or hospitality;
- facilitation payments;
- suspicious payments or commissions;
- conflicts of interest;
- improper conduct by third parties;
- procurement or tender corruption;
- falsification of records; or
- attempts to conceal improper conduct.

Reports should be made honestly and in good faith.

EPTM LTD will consider concerns appropriately and, where reasonably practicable and legally permissible, handle them confidentially.

Nothing in this reporting process prevents a person from reporting suspected unlawful conduct to a competent authority where legally entitled or required to do so.

13. NO RETALIATION

EPTM LTD does not tolerate retaliation against a person who, in good faith, raises a concern, seeks advice, refuses to participate in suspected improper conduct or assists with an appropriate investigation.

Nothing in this Statement prevents a person from exercising any legal right to report suspected unlawful conduct to a competent authority.

14. INVESTIGATION AND RESPONSE

EPTM LTD may investigate suspected bribery, corruption or related misconduct in a manner appropriate to the circumstances.
Where misconduct is established, EPTM LTD may take appropriate corrective or disciplinary action, subject to applicable law and contractual arrangements.
Where appropriate, EPTM LTD may also terminate or reconsider a business relationship, recover losses where legally possible, strengthen controls, require additional due diligence or remediation, suspend relevant activity where justified, or refer matters to relevant authorities.

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15. RISK–BASED AND PROPORTIONATE APPROACH

EPTM LTD recognises that bribery risks vary according to the nature, scale and complexity of an organisation's activities and the jurisdictions, markets, projects and business relationships involved.

EPTM LTD therefore applies a proportionate, risk–based approach to bribery prevention.

The UK Ministry of Justice guidance identifies six principles for commercial organisations' anti–bribery procedures:

1. proportionate procedures;
2. top–level commitment;
3. risk assessment;
4. due diligence;
5. communication, including training; and
6. monitoring and review.

EPTM LTD's approach is intended to reflect these principles through proportionate procedures and controls covering risk assessment, third–party due diligence, approval, gifts and hospitality, financial records, reporting, training, monitoring and review.

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16. TRAINING, AWARENESS AND COMMUNICATION

EPTM LTD seeks to ensure that relevant personnel understand its expectations concerning bribery and corruption.

Where appropriate to the role and risk involved, EPTM LTD may provide guidance, training, communications or other awareness measures concerning:

- anti–bribery requirements;
- gifts and hospitality;
- conflicts of interest;
- third–party risks;
- procurement and tendering;
- reporting concerns; and
- applicable legal and contractual requirements.

The level and frequency of such measures may be proportionate to the relevant risks.

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17. MONITORING AND REVIEW

EPTM LTD may periodically review its anti–bribery arrangements and this Statement to reflect:

- changes in applicable law;
- changes in EPTM LTD's activities or geographical operations;
- identified risks;
- business relationships;

- incidents or lessons learned;
- regulatory expectations; and
- changes in recognised good practice.

Where appropriate, EPTM LTD will strengthen or update its procedures.

Relevant anti–bribery records may include, where applicable, third–party due–diligence records, approvals, gifts and hospitality records, training records, reports, investigation records and corrective actions.

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18. RESPONSIBILITY

EPTM LTD's management is committed to maintaining a culture in which bribery and corruption are not accepted as a means of conducting business.

Every person acting for or on behalf of EPTM LTD has a responsibility to:

- act honestly and professionally;
- comply with applicable law;
- follow relevant EPTM LTD requirements;
- avoid improper advantages;
- obtain required approvals;
- complete applicable due diligence requirements;
- maintain accurate records;
- raise genuine concerns; and
- cooperate appropriately with legitimate investigations.

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19. INTERNATIONAL APPLICATION

This Statement is intended to apply to EPTM LTD's activities and business relationships globally.

EPTM LTD recognises that anti–bribery laws differ between jurisdictions. This Statement establishes EPTM LTD's global corporate standard, while applicable mandatory local laws, regulations and professional requirements will also be observed.

Where a local requirement is more stringent than this Statement, the applicable mandatory requirement will prevail to the extent required by law.

Where local law permits a practice that is nevertheless prohibited by this Statement, EPTM LTD's stricter corporate requirement will generally continue to apply unless doing so would itself breach applicable law.

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20. LEGAL COMPLIANCE

This Statement describes EPTM LTD's corporate commitments and general anti–bribery framework. Mandatory laws applicable in a particular jurisdiction prevail where they apply. This Statement should therefore be read together with EPTM LTD's applicable contracts, procedures, controls and other corporate policies.

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21. RELATIONSHIP WITH OTHER EPTM LTD POLICIES

This Statement forms part of EPTM LTD's broader corporate governance and compliance framework and should be read consistently with, where applicable:

- EPTM LTD's Terms of Use & Terms of Service;
- HSE Policy;
- Cybersecurity Policy;
- Anti–Slavery Statement;
- Privacy Policy;
- Complaints & Client Concerns Procedure;
- Social Impact Statement; and
- other applicable Company policies, procedures and contractual requirements.

Where a specific contractual or legal requirement imposes a higher standard, that requirement will be observed to the extent applicable.

22. COMPANY STATEMENT

Engineering Projects TM LTD is committed to conducting its construction design, architecture, engineering, consultancy, technical peer–review and project–management activities with integrity.

EPTM LTD does not tolerate bribery or corruption.

We expect our people and business partners to uphold the same standard.