

ANTI-BRIBERY POLICY

November 2022

OUR MISSION

SYSTRA Limited has zero tolerance of bribery and corruption and complies with the Bribery Act 2010. Whilst we are a UK registered company, this policy applies to all countries in which we operate.

Bribery is “the giving, receiving, soliciting or promising of money, a gift or anything else of real or implied value as an inducement to do something that is dishonest, illegal or a breach of trust in order to secure business or a business advantage”.

OUR COMMITMENT

Whilst we respect the rules by which others conduct their own business, these are the principles by which we conduct our business. We will:

- Carry out our business fairly, honestly, openly and with integrity
- Not make bribes, nor will we condone the offering of bribes on our behalf
- Not accept bribes, nor will we agree to them being accepted on our behalf
- Avoid appointing others to provide services for us or on our behalf who do not share these principles and who may harm our reputation
- Set out our processes for avoiding bribery and keeping to and supporting our values
- Keep clear and updated records
- Make sure that all members of SYSTRA Limited and our business partners know our principles
- Regularly review and update our programme and processes as needed
- Keep to these principles even when it becomes difficult
- Act at all times with integrity and avoid conflict of interest and any actions or situations that are
- inconsistent with our professional obligations

The SYSTRA Limited Board recognises that any violation of anti-bribery and corruption laws could subject colleagues to severe penalties including unlimited fines and imprisonment. The SYSTRA Limited Board require the following procedures to be implemented and maintained:

- Compliance with this policy and the SYSTRA Group Ethics and Compliance Programme
- Training to allow recognition of, and avoidance of, bribery
- Vigilance and reporting of any suspicion of bribery, immediately to the SYSTRA Limited Chief Executive Officer
- Investigation of any alleged bribery
- Disciplinary action against anyone involved in bribery
- All of our business partners must be informed of this policy and must comply with this policy.



Nick Salt
CEO

SYSTRA LIMITED - UK & IRELAND

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