

ANTI-BRIBERY POLICY

November 2023

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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