

OUR COMMITMENT

SYSTRA Ltd ("SYSTRA") is committed to ensuring that all the personal data it processes, including personal data relating to colleagues, clients, customers, and suppliers, is managed appropriately and in compliance with the Data Protection Act 2018, the Data (Use and Access) Act 2025 and accompanying legislation ("UK Data Protection Laws").

SYSTRA is committed to implementing any changes in law promptly to ensure that any individual, supplier or client whose personal data has been processed by SYSTRA, has access to a formal platform through which they can submit data protection complaints.

In addition to an individual's right to complain to the Information Commissioner's Office, SYSTRA's data protection complaints procedure, in accordance with ICO guidance, is outlined below.

SCOPE

This policy applies to:

- All SYSTRA colleagues including permanent, fixed term and agency colleagues.
- All suppliers (including consultants, contractors and any other individuals who provide services or goods to SYSTRA).
- Any partner of a JV or Consortium with SYSTRA.
- Any client where SYSTRA processes or controls Personal Data on their behalf under contract.
- Any member of the public whose personal data SYSTRA has processed.

This policy applies to all the personal data SYSTRA processes about an individual, regardless of the location or type of company device of where that personal data is stored.

Everyone who undertakes work for SYSTRA or on SYSTRA's behalf must read this policy.

PROCEDURE

1 Acknowledgement of complaints

SYSTRA will acknowledge a data protection complaint within **30 days via one of the following means:**

- a) Automatic response;
- b) Acknowledgement letter; or
- c) Verbal acknowledgement, followed up in writing.

We will always first confirm the identify of a complainant using official government-issued form of photo ID where possible. Where this is not possible then we will use as many alternative forms of ID evidence as needed to establish the complainant's identity with reasonable certainty. SYSTRA will not accept a complaint where the complainant cannot confirm their identify to this standard. Any personal data provided for this purpose will not be held any longer than is necessary for establishing the identity.

SYSTRA will acknowledge complaints within 30 days, including where a complaint is received on a weekend. If the final day for acknowledgement falls on a weekend, then SYSTRA will respond on the next working day.



We will take a practical approach to acknowledging any complaints and will keep a record demonstrating that the 30-day acknowledgement requirement has been met.

2. Investigation

We will investigate the complaint and, where possible, make enquiries without undue delay.

In doing so, we will gather as much information as possible in accordance with SYSTRA's internal policies and standards (including this one).

If you have made a data protection complaint and we consider that the nature of the complaint is not clear, we may ask you for further information to enable completion of enquiries.

We will keep you updated on the progress of the investigation at reasonably practicable intervals.

3. Outcome

We will provide the outcome of the complaint as soon as our investigations have completed.

To ensure fairness and transparency, our response will set out what we have done to resolve your complaint and any actions we have taken as a result. The outcome will explain how we reached the decision and how we have complied with our obligations under UK Data Protections Laws and, in Ireland, EU Data Protection Laws. If the complainant is from a child then SYSTRA's communications with the complainant will use age-appropriate language and style and we will ensure appropriate safeguards are applied at each stage of the process.

FAILURE TO COMPLY

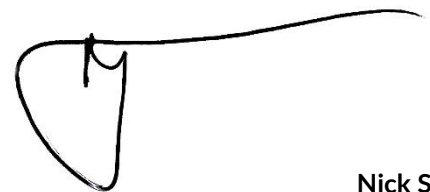
At SYSTRA, we take compliance with data protection and this policy very seriously. Failure to comply puts SYSTRA's business at risk of enforcement action, monetary penalties from the Information Commissioners Office, and reputational damage.

Any breaches of the UK Data Protection Law, the EU GDPR, this policy, or any procedures or guidance documents governing personal data and complaints will be investigated by the DPO and Compliance Team.

Any colleague who is found to be in breach of this policy may be subject to formal proceedings under our disciplinary process.

MONITORING

SYSTRA's DPO will monitor compliance with this policy on an ongoing basis. This policy will be reviewed annually and updated as necessary. SYSTRA Limited's Chief Executive Officer shall sign and date each annual update to this policy.



Nick Salt
CEO
SYSTRA LIMITED - UK & IRELAND
June 2026

