

ANTI-BRIBERY & CORRUPTION POLICY STATEMENT

1 Objective

We acknowledge our statutory obligations with regards to anti-bribery and corruption regulations. We will ensure that the company's business is conducted in an ethical manner and remain committed to the highest standards in business. We value our reputation for ethical behaviour, financial probity and reliability and will do all that we can to uphold it.

2 Scope

COWI in the UK & Ireland are companies of consulting professionals, specialising in the design and development of transportation infrastructure and energy projects. We undertake projects at our offices in Bristol, Derby, Dublin, Glasgow, London and York. We are a subsidiary of COWI A/S.

We recognise that over and above the commission of any crime, any involvement in bribery will also reflect adversely in our image and reputation. The aim of this policy is to limit the company's exposure to bribery by:

- › Setting out a clear anti-bribery policy
- › Regularly training employees so that they can recognise and avoid the use of bribery by themselves and others
- › Encouraging our employees to be vigilant and to report any suspicion of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately
- › Rigorously investigating instances of alleged bribery and assisting the police and other appropriate authorities in any resultant investigation and prosecution
- › Taking firm and vigorous action against any individual(s) involved in bribery

3 Policy statement

We prohibit the offering, the giving, the solicitation or the acceptance of any bribe, whether cash, gifts, hospitality, facilitation payments, political or charitable contributions or other inducement to or from any person or company, wherever they are situated and whether they are a public official or body of private person or company by any individual employee, agent or other person or body acting on the company's behalf.

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6.0	31 ST March 2025	AIMA	CJW	ANSL	1 st March 2026

Key anti-bribery and corruption principles:

- › We will carry out our business honestly, fairly and with integrity
- › We will not give or offer any money, gift or hospitality to any person or any third party associated with that person to get them to do something improper
- › We will not use any third parties for the means of committing bribery
- › We will seek to gain assurance from those with whom we do business that they commit to the same principles
- › No employee will suffer demotion or penalty for refusing to offer bribes or for reporting any illegal activity they become aware of
- › Any employee found in breach of these rules shall be subject to disciplinary action

Further clarification

This policy prohibits any inducement which results in a personal gain or advantage to the recipient, or any person or body associated with them, and which is intended to influence them to take action which may not be solely in the interests of COWI UK Ltd or of the person or body employing them or whom they represent.

This policy is not meant to prohibit the following practices providing they are customary in a particular market, are proportionate and are properly recorded.

- › Normal and appropriate hospitality
- › The giving of a ceremonial gift on a festival or at another special time
- › The use of any recognised fast-track process which is available to all on payment of a fee

Inevitably, decisions as to what is acceptable may not always be easy. If anyone is in doubt as to whether a potential act constitutes bribery, the matter should be referred to your Regional Director/Practice Lead before proceeding.

Monitoring and reporting

We will maintain a register of gifts, hospitality, entertainment received and provided plus any sponsorships and donations granted. This will be reviewed at Board level.

Accountability and responsibility

The Board of Directors are ultimately responsible for setting ethical, legal and moral standard with regards anti-bribery and corruption.

The Senior Leadership Team are responsible for raising any breach of the anti-bribery and corruption policy to the attention of the SVP who will raise with the Board if necessary.

The Board of Directors are responsible for establishing suitable channels of communication by which employees or others can report confidentially any suspicion of bribery.

Whistleblower can be used to report any of the above. Training will be given to all new employees at the time of Onboarding and will be repeated every three years.

All employees have a responsibility:

- › For the prevention, detection and reporting of acts of bribery or corruption
- › To avoid any activity which might lead to, or suggest a breach of this policy
- › To notify your line manager if you believe or suspect that a conflict with or breach of this policy has occurred, or may occur in the future
- › To co-operate with the company and undertake the required training
- › To help implement this policy.

Signed: _____



Andrew Sloan
Senior Vice President
COWI UK Limited

31st March 2025

Useful links, including to other relevant COWI policies

- › [COWI Group Business Integrity Policy](#)
- › [COWI Whistleblower](#)
- › [Business Integrity Training Programme](#)
- › [Bribery Act 2010 guidance](#)