

Anti-bribery & corruption (ABC) policy

This policy is to be read in conjunction with Turner & Townsend's Code of Conduct ('Our Code') and other related policies, including conflicts of interest (CoI), gifts and hospitality and whistleblowing. Definitions of key terms used in this policy are given in Our Code.

Turner & Townsend is subject to the UK Bribery Act (UKBA) and the United States Foreign Corrupt Practices Act (FCPA) amongst other anti-corruption laws applicable in the countries we operate in. This means that we must adhere to the strictest anti-corruption laws in the world. These laws apply to all our People and companies anywhere in the world, regardless of nationality or location, as well as to Third Parties acting on our behalf.

Turner & Townsend is committed to the highest ethical standards and requires all our People to be aware of and comply with our policies and guidelines on corporate conduct. Failure to follow this policy puts at risk our ability to access key markets, maintain the strong relationships we have with our clients and is at odds with our corporate responsibilities. There are also substantial fines and imprisonment for those involved. We operate a strict no tolerance policy towards bribery and/or corruption in all its forms, whether directly or through Third Parties. We expect our clients and Third Parties working on our behalf to operate in the same way.

Turner & Townsend policy is to:

- conduct business in an ethical and honest manner, including the avoidance of bribery or other forms of corruption;
- uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we conduct business;
- take all appropriate measures to deter bribery and corruption;
- maintain necessary procedures to prevent and detect bribery and corruption;
- investigate vigorously all instances of suspected bribery and corruption;
- deal with suspected bribery and corruption as it sees fit, including reporting it to the appropriate authorities, with the intention of pursuing criminal prosecution and/or civil litigation;
- assist the police and other law enforcement bodies in the investigation and prosecution of suspected offenders;
- recover from offenders any assets wrongfully obtained;
- protect the confidentiality of our People in line with Turner & Townsend's Whistleblowing policy; and
- communicate Turner & Townsend's Anti Bribery & Corruption Policy to all our People via induction programmes, handbooks, etc.

It is never acceptable to:

- give, promise to give, or offer, a bribe, kickback, facilitation payment or any other type of payment, Gift or Hospitality with the expectation or hope that a business advantage will be created, or as a reward for a business advantage already improperly given;
- give, promise to give, or offer, a payment, Gift or Hospitality to a Public Official, agent or representative to facilitate or expedite a routine procedure;
- accept payment from a Third Party where it is known or suspected that it is offered or given with the expectation that the Third Party will improperly obtain a business advantage;



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- accept a Gift or Hospitality from a Third Party where it is known or suspected that it is offered or provided with an expectation that a business advantage will be improperly provided by Turner & Townsend in return;
- threaten to retaliate against another Turner & Townsend person, who has refused to commit a bribery offence or who has raised concerns under this and/or other related policies; and
- engage in any activity that might lead to a breach of this and/or other related policies.

Our People are expected to:

- be aware of and strictly comply with this and other related policies;
- promptly undertake ABC training and complete declarations;
- report immediately any suspicion of bribery and corruption violations or solicitations in line with Turner & Townsend's Whistle Blowing policy;
- take responsibility for bribery and corruption prevention and detection, including complying with the Third Party Anti-Bribery Due Diligence Procedures; and
- make Third Parties aware of this policy, and where required make sure the appropriate information is supplied to, and declarations received from, the relevant Third Party.

Failure to comply with this and other associated ABC policies will lead to disciplinary action and could result in dismissal for gross misconduct.

Reporting violations or solicitations

Any concerns that this or other related Turner & Townsend policies have been breached should be reported in accordance with our Whistleblowing Policy. Reports can be made to:

- nominated individuals, including (1) your Cost Centre Director and the appropriate Regional MD (2) [Global Ethics Director](#) (3) [Risk Assurance and ABC Committee Members](#) or (4) [Executive Committee Members](#); or
- our whistleblowing reporting channels, which include:
 - Phone: Country specific reporting phone numbers as set out in the Whistleblowing policy
 - Email: turntown@safecall.co.uk or ethics@turntown.com
 - Online: www.safecall.co.uk/report

Reports can be made anonymously, and we have zero tolerance towards any form of retaliation. Our People will not suffer any negative consequences for raising reports in good faith.

Advice and guidance

Advice on this and related Policies can be sought from RM (ethics@turntown.com).

Vincent Clancy
Chief Executive Officer
13 November 2024