

## Ethical Conduct Policy

Our values and commitment to business integrity stem from a desire to act honourably and with integrity in all our business dealings. We have a strong sense of responsibility to treat people respectfully and we maintain ethical business standards in all the markets in which we operate.

### Aims

Treat our people with honesty and fairness. Enable them to behave honourably and act with integrity in all our business dealings, building relationships as independent advisors and trusted professionals.

Implement best practice and raise awareness of the ethical standards we require of our people.

### We will

Maintain a Code of Practice and training programme for all our people.

Maintain procedures to see that we do not engage in unethical conduct or illegal practices.

Implement systems that support our duty of confidentiality and respect privacy in all our business relationships.

Support any member of staff who has legitimate concerns to challenge unethical behaviour and respond appropriately.

Participate in appropriate industry initiatives to promote business integrity.

Work with clients, partners and collaborators with due consideration that their ethical commitments are consistent with our own.

Keep our systems and procedures under regular review to confirm that they remain relevant and proportionate.

### Governance

This policy is set by the Group Board and implemented across all Arup operations through rules, procedures and guidance.

It is reviewed and approved annually, or more frequently if appropriate.

The Ethics Director acts for Arup in ensuring that plans are developed and implemented to enable us to reach the aims set out in this policy while fulfilling applicable legal, regulatory and other requirements.



Dervilla Mitchell  
Ethics Director  
April 2022

**“...we should act honourably in our dealings with our own and other people.”**

Ove Arup, 1970