

# Global Speak Up Procedure

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# 1. The purpose of this procedure.

This Global Speak-Up Procedure has been developed in alignment with applicable whistleblower protection laws and standards across the jurisdictions where Arup operates, including key frameworks from jurisdictions where we operate.

This Procedure incorporates additional safeguards and procedural standards, including defined timelines, reporting channel requirements, and protections against retaliation, to ensure full legal compliance and foster a culture of ethical and transparent conduct.

Acting with honesty and fairness in all our dealings is central to our values. Under Arup's [Ethical Conduct Policy](#), all members of staff are encouraged—and expected—to challenge illegal or unethical behaviour and to raise legitimate concerns through the appropriate channels, in line with our procedures (including Speak Up). If you are unsure whether a situation raises an ethical issue or which route to use, seek guidance from your Regional Ethics Representative, Regional Business Integrity Liaison, or Regional Legal Team.

We want legitimate concerns about the ethical conduct of our business to be raised promptly and through the right channels so they can be addressed quickly and appropriately.

## The following sections explain

2. **What** kind of disclosures are within this procedure
3. **Who** can make a disclosure
4. **How** a disclosure can be made
5. **What** protections and support is available to someone making a disclosure under this procedure
6. **How** how disclosures will be assessed, managed, and investigated

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<sup>1</sup> Often referred to as 'whistleblowing legislation'.

## 2. What kind of disclosures are covered within this procedure

### What this procedure covers

This procedure applies to disclosures concerning illegal or unethical conduct relating to our activities.

Examples of the types of matters that may be disclosed through Speak Up include legitimate concerns based on reasonable grounds relating to:

- Fraud i.e. fraudulent invoices or expenses.
- Corruption i.e. collusion in tendering.
- Bribery i.e. offering or accepting a bribe.
- Illegal conduct, whether criminal or civil in nature i.e. money laundering.
- Conduct contrary to [Arup's Ethical Conduct Policy](#).
- Conduct contrary to [Business Integrity Code of Practice](#).
- Unethical or improper workplace conduct,
- Any other unethical conduct in relation to any Arup company.
- Serious workplace misconduct that breaches law or company policy.
- Any other unethical conduct in relation to any Arup company.

The conduct does not have to be a breach of the law for a disclosure to be made.



## Other options

Concerns that are not related to unethical or illegal conduct should be raised through the appropriate channel.

We encourage open dialogue and for legitimate issues, concerns and questions to be raised in appropriate forums.

Line managers, Group Leaders and the People Team are usually the appropriate resources to connect with for advice and support to address questions, issues or concerns.

The [Global Project Selection Principles](#) (PSPs) are a global, Executive Board-approved framework for deciding which opportunities to pursue, aligning choices to our strategy and values (no harm, social value, respect for human rights) and setting clear standards across clients, sectors, and locations. Reporters and reviewers must use the PSPs as the benchmark for project-related concerns and, where appropriate, escalate via the Sensitive Projects route to enable early, consistent decisions alongside existing bid/no-bid processes.

Employment-related concerns, issues or problems (such as the non-exhaustive examples below) should be addressed through the applicable People procedures:

- Questions about pay or salary;
- Employment grievances or complaints.
- Issues with annual leave or holiday entitlement;
- Disputes about performance reviews or appraisals;
- Promotion or transfer.

Refer to [Global People](#) and your local People procedures. Also see section 7.3 for details of the Employee Assistance Programme.

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## What kind of disclosures are captured?

### Speak Up

Nimit has agreed to an ongoing sub-consultancy arrangement with their friend and the price is higher than usual market rates for the services.



### General Workplace Question

Robin has a question about how their annual leave is calculated and wants clarification on the Company Policy.



### 3. Who can make a Speak Up disclosure?

The following people can make disclosures under this procedure:

- Current or former members of any Arup company
- Current or former sub-consultants, suppliers or contractors to Arup
- Current or former clients, partners or collaborators of Arup
- A spouse, relative or dependent of any of the persons mentioned above.

If you fall within one of the categories of people outlined above and you are making a disclosure of the kind covered by this procedure, you will be entitled to the protections we set out later in this procedure.

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#### Who can make a disclosure under the policy?

1.

In relation to Nimit's example:

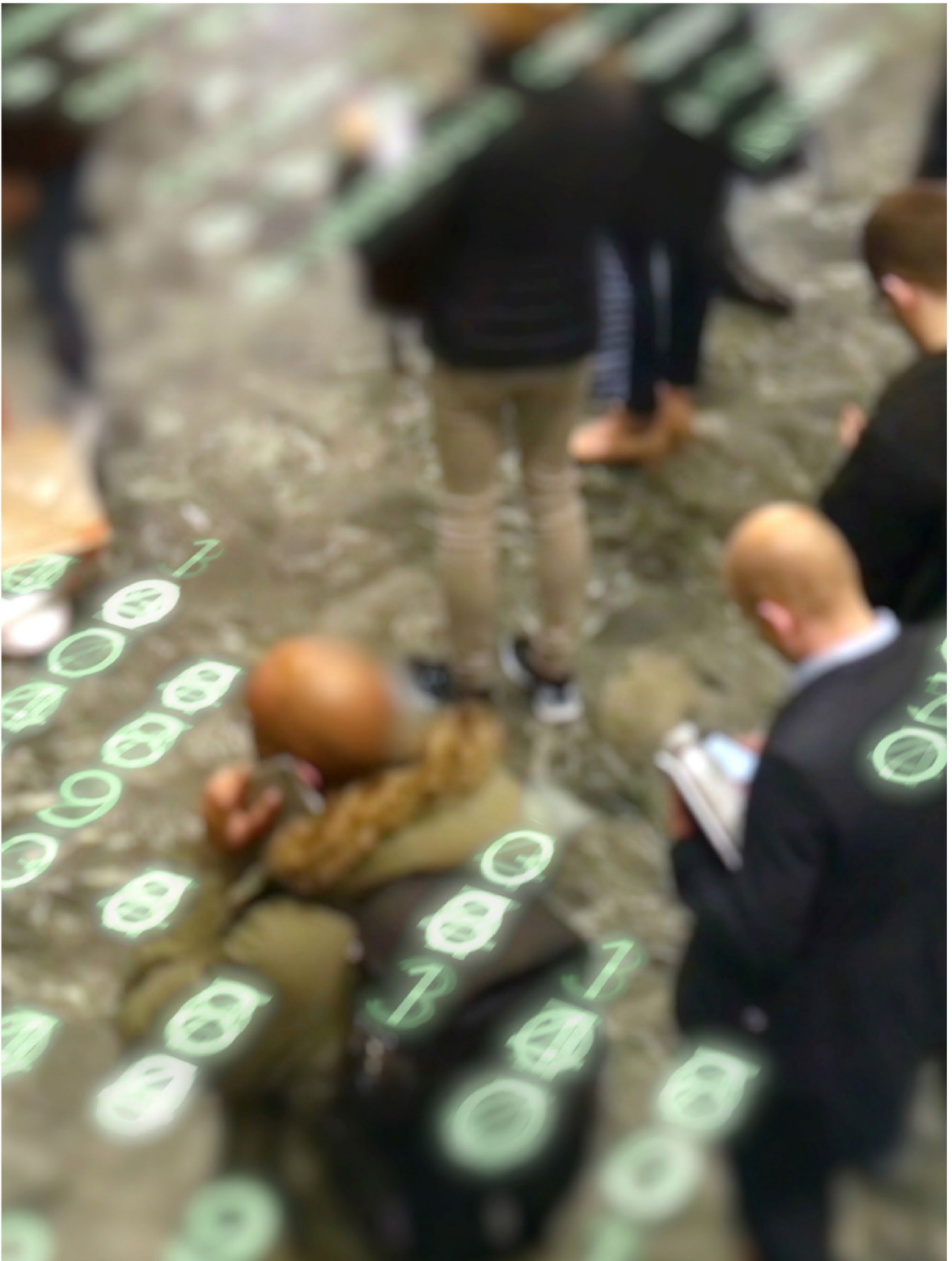
- the previous supplier of those services
- Nimit's partner, relatives or dependents
- other Arup staff members

2.

Fatima (an Arup member) has just found out that their friend Marco (also an Arup member) has been inflating their work-travel related expense claims.

- Fatima can make a disclosure
- Fatima's partner can make a disclosure





## 4. Who can you make a relevant disclosure

If you are in a category of persons who can make a disclosure, as referred to in Section 3, and you want to report a matter of the kind covered by this procedure, as outlined in Section 2, you can raise your concern in the following ways:

**Directly, with any of the following people:**

- Arup Group Ethics Director
- A member of the Global Ethics Committee, including your Region Ethics Representative
- A member of the region Ethics Committee
- Your legal team
- Arup Business Integrity Leader or BI Region Liaison

**Anonymously, if you wish through the [link](#) on the Speak Up Essentials page if you are an Arup employee, if you are external, please use the following link: [arup.ethicspoint.com](https://arup.ethicspoint.com)**

We encourage disclosers to identify themselves when making a disclosure, as this will usually make it easier for additional information to be obtained where required. However, you can raise your concerns anonymously if you wish.

**Speak Up system managed by NAVEX:**

Arup's Speak Up reporting channels and case management platform are hosted and administered by NAVEX, an independent, industry-leading provider of ethics and compliance solutions. NAVEX provides secure web reporting and a case-management system used by Arup to receive, triage and investigate concerns. All data is handled in line with applicable data-protection laws and Arup policies, and technical and organisational measures are in place to protect information. Your identity will not be shared beyond those with a need to know without your consent, unless required by law or necessary to address the issues raised.



## 5. Timeline for Handling Disclosures

### **Acknowledgment of Receipt:**

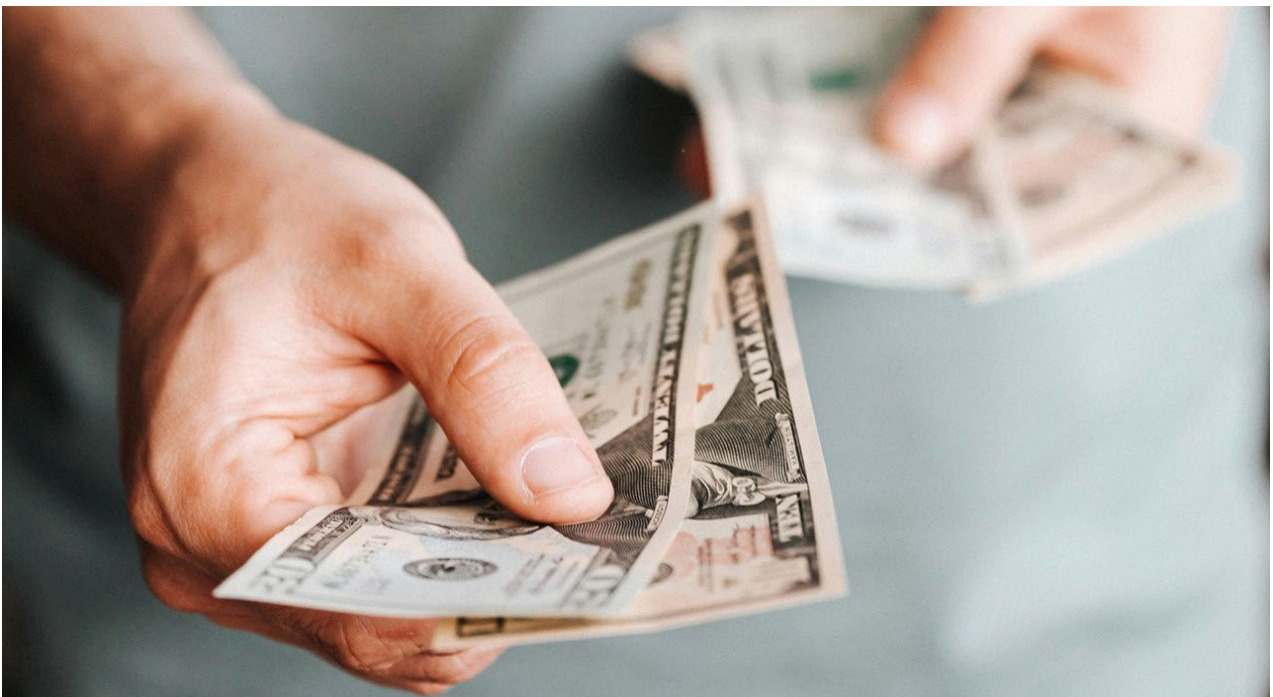
Arup will acknowledge receipt of a disclosure within seven (7) calendar days of receiving it, provided the identity or contact details of the discloser are known.

### **Feedback on Outcome:**

Arup will provide the discloser with feedback within three (3) months from the date of acknowledgment. This feedback may include the status of the investigation, the outcome (where legally and practically possible), or any measures taken as a result of the disclosure.

### **Anonymous Disclosures:**

Where a disclosure is made anonymously, Arup will acknowledge receipt and, where possible, communicate and request further information through secure two-way messaging while protecting the reporter's anonymity. If the reporter does not engage via the secure mailbox or provide any means for follow-up, Arup may be unable to acknowledge receipt or provide direct feedback. All anonymous disclosures will be assessed, triaged, and—where appropriate—investigated in line with Arup's standards and applicable legal obligations.



## 6. How Arup will deal with a disclosure.

### Initial assessment and routing

Region Disclosure Review Team (RDRT). Each region maintains an RDRT to review and triage disclosures raised under this Procedure. The RDRT is composed of the following roles (not individual names):

*Region Ethics Representative / Business Integrity Liaison*

*Region General Counsel*

*Alternates: Each role has at least one designated alternate to avoid delays and manage conflicts.*

**Conflicts & independence.** Any member who is named in the disclosure, reports to a person named, or is otherwise conflicted must recuse themselves. An alternate will step in to replace the recused person. The RDRT operates independently of the subject's line management and on a strict need-to-know basis.

**What the RDRT does.** The Region Disclosure Review Team (RDRT), comprising Business Integrity and Legal, receives and records disclosures, safeguards confidentiality on a strict need-to-know basis, and makes the initial scope and routing decision. Within two business days of intake (twenty-four hours for urgent matters), the RDRT classifies the disclosure and decides whether it proceeds under this Speak Up Procedure or is routed to People procedures. Not every disclosure requires a full investigation.

People-related misconduct that raises legal or policy concerns-such as discrimination or harassment, bullying or abusive conduct, retaliation, abuse of authority, dignity-at-work violations, conflicts of interest, or systemic culture issues-is handled under this Speak Up Procedure. By contrast, personal employment administration issues (for example pay, leave, scheduling or performance-rating disputes) are usually routed to People procedures with Legal support as needed. Where there is any doubt, the disclosure is accepted through Speak Up and routed by Legal to the appropriate process, including engagement of local counsel where required and in compliance with applicable privacy laws.

For disclosures arising in, or materially connected to, any jurisdiction or topic that may create legal or regulatory exposure (including but not limited to discrimination/harassment, retaliation, bribery/corruption, competition/antitrust, sanctions/export controls, serious health, human rights violations & safety incidents, or significant data-protection events), Legal acts as initial reviewer and investigation lead and will determine whether to seek and maintain legal professional privilege/attorney-client privilege, attorney work-product, or analogous protections. Documents prepared for the purpose of obtaining legal advice or in reasonable anticipation of litigation should be created at Legal's request and handled in accordance with Legal's instructions. Where an investigation is warranted, the RDRT coordinates the appointment of an





independent, conflict-free investigator in line with the Internal Investigations Procedures RACI; Legal may appoint an external investigator where senior leadership is implicated or independence could reasonably be questioned.

### Acknowledgement and updates

Where we know the discloser's identity/contact details, we will acknowledge receipt within 7 calendar days and aim to provide feedback on progress or outcome within 3 months of acknowledgement, unless restricted by law or preserving the integrity of any investigation.

### Confidentiality and non-retaliation

We will keep identities confidential to the extent reasonably possible and permitted by law, and we prohibit retaliation against anyone who raises a concern in good faith.

### Investigations

Where a disclosure proceeds to investigation, the matter will be conducted in accordance with Arup's Internal Investigations Procedures. The Internal Investigations Procedures ([link](#)) govern how investigations are carried out.

Where an investigation is appropriate, we will appoint an investigator who is independent of the subject matter and free from conflicts of interest. The scope and approach will be defined case-by-case and may involve internal or external expertise (e.g., Legal, Business Integrity, Finance, Digital Technology, Health & Safety). Not every disclosure requires an investigation (for example, where the matter has already been addressed or underlying facts show no breach).

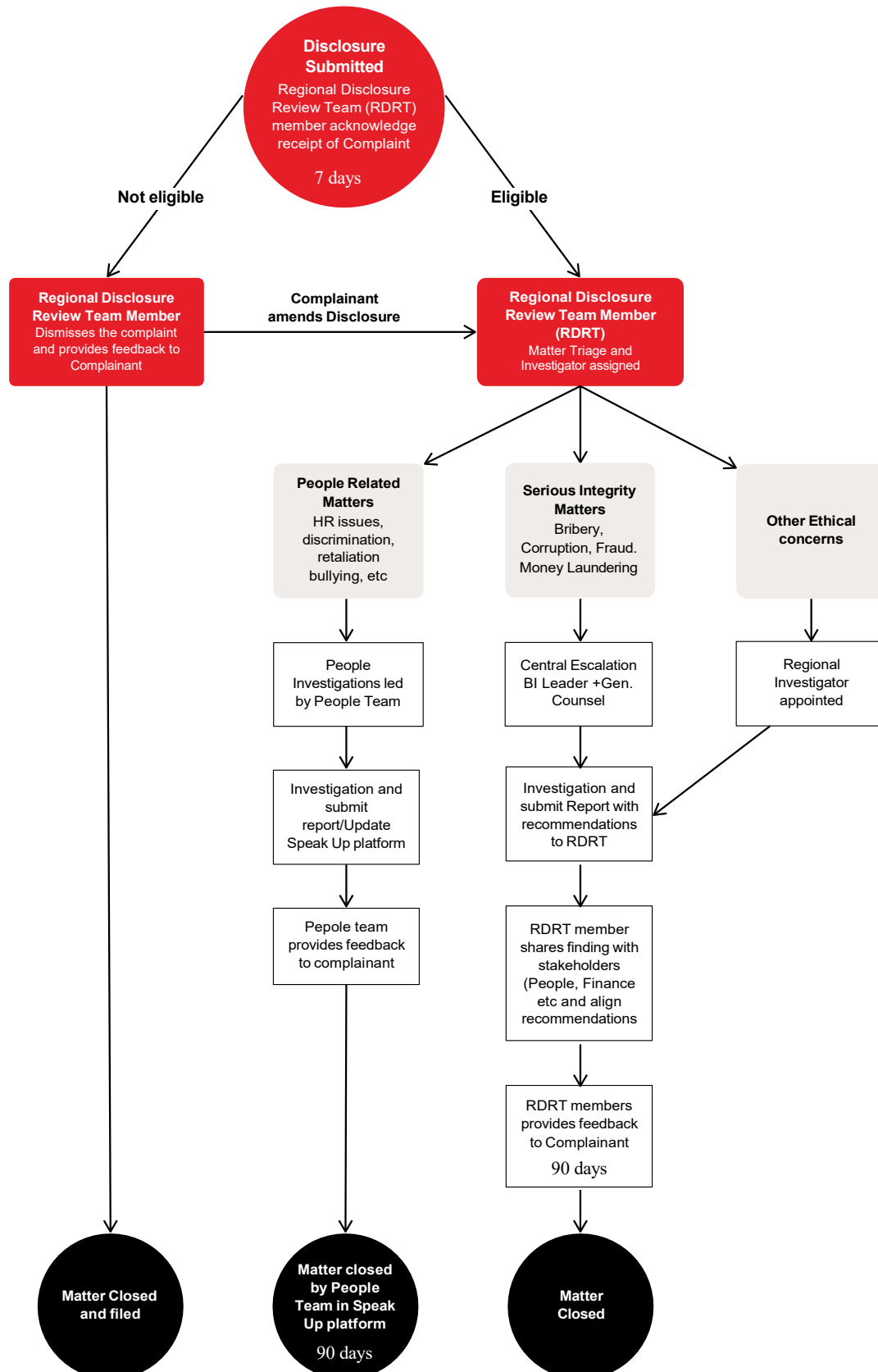
### Outcomes and reporting back

At the conclusion of any investigation, we will determine what action, if any, is required. Where the discloser's identity is known, we will provide such updates as are appropriate in the circumstances. To protect confidentiality, legal privilege, and privacy, we may not share specific evidence or a copy of any final report.

### Data protection

We handle personal data in line with applicable data-protection laws and our internal policies.

## Process after a disclosure has been submitted



## 7. What protections are available to persons making a protected disclosure?

If you are in one of the categories of people who can make a disclosure, as referred to in Section 3, and you make a disclosure of the kind covered by this procedure, as outlined in Section 2, then the following protections will be available to you.

### 7.1 Confidentiality

We understand that the decision to make a disclosure is a significant one, and we aim to ensure our procedures result in disclosures being treated confidentially and securely, including protection of a discloser's identity.

This procedure protects the confidentiality of your identity. We will not disclose your identity or disclose information that is likely to lead to your identification, unless one or more of the following applies:

- You consent to this; or
- Disclosure is required by law; or
- Disclosure is required for the purpose of obtaining legal advice; or
- The information disclosed does not include your identity and we have taken all reasonable steps to reduce the risk that you will be identified and it is reasonably necessary for us to disclose the information in order to investigate the issues raised by your disclosure and/or take any necessary action.

We expect all our staff members, officers and agents to act in accordance with these requirements. If a person has any information, because a disclosure has been made, that could disclose the identity of the person who made it (including where that information is likely to lead to that person being identified), that person should keep such information secure and confidential.

Subject to the above, Arup may need to report details of the disclosure for compliance and regulatory purposes, for example, to relevant boards or other committees where serious allegations are made that require their awareness or involvement.





## 7.2 Protection from any retaliation (negative impact) as a result of you making a disclosure

You are protected from retaliation if you raise a concern in good faith. This means no one should treat you unfairly, threaten you, or disadvantage you because you reported an issue or considered doing so. If you believe you are experiencing retaliation, you are encouraged to report it. The company takes these matters seriously and will investigate any concerns raised.

We aim to ensure that you are protected from all forms of unlawful victimisation or detriment because you have made a disclosure.

In this context, detriment includes, but is not limited to:

- termination of your employment;
- disciplinary action such as warnings;
- demotion;
- harassment or intimidation;
- unlawful discrimination between you and other staff members of the same employer;
- harm or injury, including psychological harm;
- reputational damage or property damage;
- damage to your business or financial position; or
- any other damage.

We expect all our staff members, officers and agents to ensure that any decisions about employment are made in accordance with the law and with our policies and procedures. We will not tolerate any decisions that penalise or threaten a person with the conduct described *above*.

If you are concerned that you are being subjected to detrimental retaliation because you have made a disclosure protected by this procedure, you should advise one of the people listed in Section 4 as soon as possible so that steps can be taken by us to implement any measures considered appropriate to address the situation. Such steps may involve, but will not be limited to:

- investigating and taking disciplinary action against a person threatening or subjecting you to detriment;
- physically relocating you or persons involved in subjecting you to detriment;
- providing physical security measures for you; or
- the provision of group or individual training or counselling.

### 7.3 Employee Assistance Programme (EAP)

Arup provides a free and confidential Employee Assistance Programme, which provides support to all staff members and their immediate family members.

The support available includes professional counselling services. For details on how to contact the Employee Assistance Programme in your country/Region, and for more information on available services, please refer to the [Employee Assistance Program Essentials page](#).

A person making a disclosure can also seek support from any of the people listed in Section 4.

### 7.4 Reasonable basis for making the disclosure

Before you make a disclosure under this procedure, we expect you to have reasonable grounds for doing so. You must have reasonable grounds to suspect that the information concerns the type of misconduct or other matters covered by this procedure, as outlined in Section 2.

You are not required to ‘prove’ your disclosure and a disclosure will still attract the protections under this procedure (and local legislation if applicable) even if it turns out to be incorrect.

However, you should not make any disclosures under this procedure which you know to be false or where you do not have reasonable grounds for holding those concerns. In that case we suggest you consider whether there are any other alternative avenues for you to raise your concerns with us as we have other procedures that can be utilised for other kinds of complaints and concerns.

Misuse of this procedure could also be grounds for disciplinary action. For example, if you make a disclosure which you know to be false, then the protections outlined above are unlikely to apply and you may be subject to disciplinary action as a result. It may also involve a breach of the law. Any person who has experienced conduct in breach of the law may also have the ability to seek remedies against the people involved. Any person involved could be personally liable for any unlawful conduct that they are involved in.

Any person who has questions about their rights or obligations that arise under law (outside this procedure) is encouraged to seek professional advice about their position.

## 8. What to do if you are not happy with the way Arup has dealt with a disclosure.

If you have concerns about the way in which your disclosure has been addressed, you may escalate the matter to any one of the following:

- Region Ethics Representative
- Region Legal Counsel
- Arup Business Integrity Leader
- Arup Group Ethics Director
- Region Managing Director
- Region Performance and Operations Leader

## 9. How this procedure will be made available to persons who are able to make a disclosure.

This procedure will be available to staff and contractors on the Arup intranet. Relevant information from the Speak Up procedure will be made available to external parties on arup.com.

**Nothing in this procedure shall prevent or restrict you from dealing with any appropriate regulatory or law enforcement body external to Arup.**



