

Last updated	September 2025
Ву	Claire Owen

Definitions

Ecorys, we or the company	Means Ecorys UK Ltd,
	Registered company number: 01650169,
	Registered office: Albert House Quay Place, 92-93 Edward Street, Birmingham, B1 2RA.
Policy	Means this Business Conduct, Ethics and Social Value Policy as amended from time to time.
Responsible Person	Means HR, Line Managers, Compliance Director, Project Directors and UK Board.
Suppliers	Means, contractors, consultants, including anyone subcontracted to Ecorys UK for the performance of Ecorys UK or Ecorys' UK Clients' work.

1. Introduction

Ecorys' reputation for conducting its business with integrity, as an ethical company and with respect to the interests of those our activities affect, is an asset, just as real as our people and brands.

We aim to run a sustainably profitable business and that means investing for growth and balancing short and long-term interests. It means caring about our clients, employees, consultants, shareholders and suppliers, and the communities in which we conduct our business. We consider it essential that all staff and subcontractors understand and comply with our Ecorys values and share our way of doing things.

Our Values





EntrepreneurialWe value

we value creativity and innovation, empowering our people to develop new ideas and adapt to a changing world



Integrity

We value our ethics and our independence. Our work is trusted to be high quality



We work together in global teams, valuing diverse perspectives, and collaborating to achieve more

Leadership

We lead by shaping ideas and setting standards in our fields, leading by example to deliver positive impact

This Business Conduct, Ethics and Social Value Policy is a core Ecorys Policy, and we commend it to all our suppliers.

2. Scope

This policy applies to all Ecorys UK activities carried out on behalf of our clients, any Ecorys business entity, or at any time when suppliers or subcontractors act as ambassadors or representatives of the Ecorys brand, including digital, public, and client-facing activities. Suppliers are responsible for exercising good judgment in their behaviour and actions.

This policy outlines the standards for ethical conduct, integrity, and the delivery of social value expected when you act as a representative or subcontractor of Ecorys UK. It applies whenever you represent Ecorys UK, whether on client work, in public forums, or at conferences in Ecorys UK's name. It complements (and does not replace) local law and client requirements.

Social Value has been defined as the extra benefit to the community resulting from a commissioning or procurement process, beyond the direct purchase of goods, services, and outcomes. Ecorys UK supports this aim with all our clients.

2.1 Standard of Conduct

Suppliers must uphold Ecorys UK's principles of conducting business with transparency, honesty, and integrity, while respecting the interests of all our clients, employees,

consultants, shareholders, stakeholders, suppliers, and the communities where we operate. Suppliers are responsible for always exercising good judgment and maintaining Ecorys UK's standards.

Our culture is anchored in Ecorys values: Caring, Entrepreneurship, Integrity, togetherness, and Leadership. These values guide our decisions and actions, and we expect all suppliers and subcontractors working for Ecorys to uphold these values and behaviours.

Expected behaviours

- Do what's right: act honestly, fairly and transparently, seek advice if unsure
- Respect & include: treat everyone with dignity, foster inclusion and accessibility in our work and workplaces
- **Be accountable**: take responsibility, raise concerns early, and remediate issues quickly
- Deliver quality and value: Meet our ISO-backed quality, information security, and environmental standards and deliver measurable social value.

2.2 Regulatory and Legal Compliance

Suppliers must comply with all company policies and standards as stated where appropriate for the work undertaken and detailed in their contracts.

Suppliers must comply with all applicable laws and regulations for the countries they work within, including but not limited to:

- Bribery Act 2010
- Modern Slavery Act 2015
- UK GDPR and Data Protection Act 2018
- Health and Safety at Work Act 1974
- Competition Law
- Criminal Finances Act 2017.

2.3 Equality, Diversity, Inclusion and Respectful Workplace

Ecorys UK is committed to promoting equality, diversity, and inclusion in all areas of its business. Suppliers must:

- Support a respectful, inclusive environment free from discrimination or harassment
- Comply with Ecorys UK Equality and Diversity Policy
- Recognise Ecorys UK status as a Living Wage Employer and Disability Confident Committed organisation
- Use local experts and ensure services are accessible for all
- Ecorys expects all suppliers to treat everyone with respect and dignity, fostering an inclusive workplace free from discrimination or harassment.

2.4 Conflicts of Interest

Suppliers must always act in the best interest of Ecorys UK and its clients when performing their work. A conflict of interest occurs when personal, financial, or other external interests could or might appear to improperly influence a supplier's judgment, decision, or actions on behalf of Ecorys UK.

Suppliers must consider the following to ensure Ecorys UK can effectively manage any potential conflict of Interest

- Avoid conflicts: Proactively avoid situations where personal or organisational interests may conflict with your duties to Ecorys UK
- Disclosure: Promptly disclose any actual, potential or perceived conflicts of interest
 to your Ecorys Contract Manager or the Responsible Person. This includes
 relationships, investments, secondary employment or any other interests that could
 influence your work. You may be asked to sign a specific Conflict of Interest
 Declaration for specific client work or as Supplier Due Diligence.
- **Transparency:** Provide full and honest information about the nature of the conflict, including all relevant facts in writing.
- Management and Ongoing Duty: Work with Ecorys UK to agree on appropriate steps to manage or mitigate the conflict. Update your disclosure if circumstances change or new conflicts arise during your work.
- **No retaliation:** Ecorys will not penalise suppliers for raising or disclosing conflicts in good faith.

Examples of Conflicts of Interest:

- Personal or family relationships with Ecorys staff or clients involved in the contract
- Financial interests in organisations bidding for or delivering related work.
- Current or recent work on a conflicting piece of work, which could create conflict with the client
- Secondary employment or consultancy that overlaps with Ecorys UK projects or specific contracted work
- Receipt of gifts, hospitality or benefits from Ecorys competitors or clients

Failure to disclose or appropriately manage a conflict of interest may result in termination of contract and other legal or reputational consequences.

2.5 Promotional Activities

Ecorys UK neither supports political parties nor contributes to the funds of groups whose activities are calculated to promote party interests.

Suppliers must ensure that all promotional activities related to Ecorys UK are conducted ethically and transparently, safeguarding the reputation and interests of Ecorys and its clients.

All statements, marketing materials and public communications relating to Ecorys UK and Ecorys Group clients must be approved prior to use.

Do not use the Ecorys name to influence government or political decisions, or to support political parties or causes. Exercise caution and professional due care when referencing Ecorys UK or Group on social media or digital platforms and avoid posting or sharing content that could harm Ecorys or breach client confidentiality.

2.6 Service Quality, Research Ethics in delivery.

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Ecorys provides products and services that reliably offer value in terms of cost and quality. Ecorys UK holds ISO 9001-2022 certification. Suppliers are expected to align their work, where appropriate, when carrying out subcontracted services for Ecorys with Ecorys's ISO 9001 policies and standards.

If appropriate, suppliers are expected to apply Ecorys UK Ethics Committee guidance and relevant professional codes, ensure consent, privacy, and duty of care, and complete ethics and safeguarding reviews.

Ecorys UK has an Al policy and a code of conduct. Suppliers are expected to adhere to client-specific Al requirements as detailed in individual contracts. When using Al, the supplier must ensure never input personal, client-confidential, or commercially sensitive data into Al tools and clearly disclose any Al-assisted content to Ecorys UK and clients.

2.7 Environmental responsibility and climate action

Ecorys UK is committed to running its business in an environmentally sound and sustainable manner. Our aim is to ensure that our processes and products have the minimum adverse environmental impact commensurate with the legitimate needs of the business. Ecorys UK is certified to the Environmental standard ISO 14001.

Suppliers must

- Support Ecorys UK's net zero ambitions
- Minimise environmental impact in all activities, including travel and resource use.

2.8 Competition

Ecorys UK believes in vigorous yet fair competition and supports the development and enforcement of appropriate competition laws. Suppliers should ensure that they understand such laws, as applicable to their country of operation and do not transgress them.

Anti-competitive behaviour of any kind will not be tolerated.

2.9 Reliability of Financial Reporting

Suppliers must

- Ensure all records and supporting documents accurately reflect transactions
- Provide accurate financial reports in a timely manner in accordance with specific contracts.
- Comply with all UK Financial and Corporate laws and regulations.

2.10 Bribery

Ecorys UK does not give or accept bribes in any form to secure or provide business, financial, or commercial benefits. Ecorys UK Suppliers are advised that any expectation, request, demand for, or offer of such bribes, or any corrupt gifts, must be immediately rejected and reported to the Responsible Person.

All suppliers must comply with the Anti-Bribery and Corruption Policy.

2.11 Modern Slavery and Human Trafficking

The Ecorys Group of Companies supports the UK Modern Slavery Act 2015 in all aspects of its operations and services. We maintain a zero-tolerance stance on any form of modern slavery and human trafficking, conducting appropriate due diligence within our supply chain to ensure that slavery and/or human trafficking are not tolerated among our suppliers.

Suppliers must:

- Support the UK Modern Slavery Act 2015
- Have a zero-tolerance approach to modern slavery and human trafficking
- Undertake due diligence in their own supply chains

2.12 Safeguarding Children and Vulnerable Adults

Ecorys UK is committed to protecting children and vulnerable adults we meet during our work. Safeguarding is about protecting certain people who may be in vulnerable circumstances.

A child is defined as someone who has not yet reached their 18th birthday. A vulnerable adult or 'Adult at risk' is defined as someone with care and support needs who is at risk from abuse or neglect.

Safeguarding and promoting the welfare of children is defined as:

- protecting children from maltreatment.
- preventing impairment of children's health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes

All suppliers must comply with the Safeguarding Children and Vulnerable Adults Policy.

2.13 Confidentiality and Data Security

Ecorys UK is committed to safeguarding the confidentiality, integrity and availability of all information assets, including internal, client and supplier data. All suppliers must:

- Handle data in accordance with UK GDPR, the Data Protection Act 2018, and Ecorys 27001-aligned Information Security Management System.
- Access confidential information strictly on a need-to-know basis, use approved client classifications.
- Store sensitive data on secure systems and only transmit data via secure, encrypted channels
- Do not upload sensitive or client data to any Al tools, unless agreed and approved by Ecorys and the client (if relevant)
- Report any suspected data breach, loss of unauthorised disclosure immediately to Ecorys Data Protection Officer (<u>DPO@ecorys.com</u>)
- Always comply with Ecorys Data Protection Policy, Information and Data Security Policy and any specific confidentiality requirements in Suppliers' contracts.
- Understand that failure to comply may result in contract termination and legal consequences.

3. Compliance Measurement

The Responsible Person will verify compliance with this policy using various methods, including but not limited to business tool reports and internal and external audits. The Contract Director is responsible for ensuring that suppliers communicate, understand, and observe the principles outlined in this Policy. The Board of Management of Ecorys UK commits that no supplier will face repercussions for raising, with their own or senior management's awareness, a breach or suspected breach of these principles. The Ecorys Whistleblowing Policy explains how staff can raise concerns and how management will respond to such concerns.

If you notice or suspect any wrongdoing—such as fraud, bribery, safeguarding issues, data breaches, bullying, or harassment—report it to the appropriate Contract Director, DPO, or through the company's Whistleblowing channels.

4. Exceptions

Any exception to the Policy must be approved by the Responsible Person in advance, in writing.

5. Non-Compliance

Suppliers found to have violated this policy will be subject to appropriate performance management action, up to and including termination of contract in accordance with the Supplier contract

6. Business Conduct and Ethics Policy Review

This Policy shall be reviewed at least annually and as frequently as otherwise required to accommodate required changes.

7. Associated Documents and Policies

Equality and Diversity Policy

Safeguarding Children and Vulnerable Adults Policy

Modern Slavery and Human Trafficking Policy

Anti-Bribery and Corruption Policy

Information and Data Security Policy

Data Protection Policy

Environmental Policy 2021-2025

Acceptable Use Policy

Whistleblowing Policy