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tomorrow's  
challenges  
today

# Business Conduct, Ethics and Social Value Policy

Ecorys UK Ltd

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## Definitions

<b>Ecorys, we or the company</b>	Means Ecorys UK Ltd, <b>Registered company number:</b> 01650169, <b>Registered office:</b> Albert House Quay Place, 92-93 Edward Street, Birmingham, B1 2RA.
<b>Policy</b>	Means this Business Conduct, Ethics and Social Value Policy as amended from time to time.
<b>Responsible Person</b>	Means HR, Line Managers, the Contracts and Compliance Manager, Project Directors and Stuart Roberts, as the board level compliance officer.
<b>Personnel</b>	Means employees, contractors, consultants, temporary, and other workers at Ecorys and its subsidiaries or affiliates, including anyone subcontracted to Ecorys for the performance of Ecorys or Ecorys' 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 profitable business and that means investing for growth and balancing short and long-term interests. It means caring about our customers, employees, consultants, shareholders and suppliers, and the communities in which we conduct our business. We consider it essential that all Personnel understand and comply with our values and share the "Ecorys way" of doing things.

### Our Values- The Ecorys Way



**Caring-** we value our people, our partners and our clients



**Entrepreneurial-** we value creativity, innovation and excellence in everything we do



**Integrity-** we value honesty, transparency and seeking to do the right thing



**Together-** we value teamwork, collaboration and diversity in all its forms



**Leadership-** we value our independence, our objectivity, independent thinking and creative problem solving

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

## 2. Scope

This policy applies to all Ecorys business conducted on behalf of our clients, on behalf of any Ecorys' business entity or at any time that Personnel are acting as ambassadors or representatives of the Ecorys' brand, in any public or private event. Personnel are responsible for exercising good judgment for their behaviour and actions. Social Value has been defined as the additional benefit to the community from a commissioning/procurement process over and above the direct purchasing of goods, services and outcomes, Ecorys supports this objective with all of our clients.

### **This Policy applies to all Personnel.**

#### 2.1 Standard of Conduct

Ecorys conducts its business with transparency, honesty, and integrity and with respect for the interests of all our customers, employees, consultants, shareholders, suppliers, and the communities in which we conduct our operations. We expect all Ecorys Personnel to behave appropriately to meet this standard.

#### 2.2 Regulatory and Legal Compliance

Ecorys Personnel are required to comply with the laws and regulations of the countries in which they operate, in all actions they take for the company, whether internal or external. Personnel must comply with all company policies and standards.

## 2.3 Employees

Ecorys companies and associated Personnel are required to recruit, employ, and promote employees on the sole basis of the qualifications and abilities needed for the work to be performed. Ecorys companies and associated Personnel are committed to provide safe and healthy working conditions for its employees worldwide. Ecorys and associated Personnel believe it is essential to maintain good communications with employees, through company's communication channels and tools, and consultation procedures. We believe in developing our employees with multiple levels of training and career development opportunities open to all employees.

Ecorys is a living wage certified employer and highly recommend our associated Personnel achieve the same standard.

## 2.4 Equality and Inclusion

Ecorys and associated Personnel are dedicated to ensuring equality and diversity in all areas of business, including recruitment, supplier management and the communities we service, using local experts whenever possible. We ensure our services are accessible to all.

All Personnel must comply with the Equality and Diversity Policy.

## 2.5 Conflicts of Interests

Ecorys and its clients expect all Ecorys Personnel to consider and appropriately manage personal activities and financial interests which could conflict with their jobs and responsibilities. Appropriate management of any potential conflicts includes making the Responsible Person aware of any actual or potential conflicts.

A conflict of interest is any situation in which an Ecorys or associated Personnel's personal interests, or interests that they owe to another organisation, may (or may appear to) influence or affect the required independence in decision-making for and on behalf of Ecorys and its associated Personnel.

Such conflicts can arise from personal relationships within or outside the workplace or through activities or interests outside the workplace, such as, but not limited to, political engagement, other employments, directorships, shareholdings with voting rights in a significant volume, voluntary work, or association memberships, including school governors, trustees of charities or professional memberships.

The purpose of this section of the Policy is to protect the integrity of Ecorys and its associated Personnel's decision-making process, to enable our stakeholders to have confidence in our integrity, and to protect the integrity and reputation of Ecorys and our associated Personnel.

Personnel should not interpret our conflict-of-interest procedures as preventing or discouraging their being involved in leisure-time, community, political or other activities, or holding investments in other businesses. However, where these activities, interests or relationships give or could give rise to, or could be or be seen as giving rise to, a conflict of interest it is important that they are properly considered, managed, and registered.

Many conflicts can be avoided altogether, but where this is not possible, careful treatment is required, including transparency, declaration, appropriate authorisation, and possibly changed management of the decision in question.

This Policy requires Personnel to:

- Avoid conflicts of interest wherever possible.
- If this is not possible, Personnel should identify and disclose any conflicts of interest. Personnel must declare to the Responsible Person any matter that potentially could or could be perceived to influence their decisions or actions for Ecorys, giving the Responsible Person all the relevant facts in writing.
- Personnel must register their conflicts of interest in the Ecorys Register of Interests maintained by the Ecorys Contracts and Compliance manager and keep this registration up to date. This information remains in the custody of the Contracts and Compliance Manager and is kept in accordance with Ecorys Data Protection principles. If required to be disclosed to customers as part of our contractual obligations, the information will be anonymised. The information will be updated as a minimum annually.
- Whether Personnel have registered any potential conflict of interests or not during the annual register's update, they must always declare them as soon as they become aware of any potential for a conflict and be prepared to withdraw from any decision-making capable of being impacted by their conflict of interest, or to take such other steps or measures as may be reasonably requested by the Responsible Person.

## 2.6 Promotional Activities

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

Ecorys companies and Personnel are encouraged to promote and defend their legitimate business interests. In doing so they may either directly, or through bodies such as trade associations, raise questions and discuss particular government actions or decisions. Where their experience can be useful, they are encouraged to cooperate with governments, individuals, agencies, and other organisations in the development of proposed legislation and other regulations which may affect such legitimate interests.

Ecorys companies and Personnel are also encouraged to respond to requests from governments and other agencies for information, observations or opinion on issues relevant to business and the community in which we operate, ensuring that they are maintaining an independent, evidence-based approach.

## 2.7 Quality

Ecorys is committed to provide products which consistently offer value in terms of price and quality. Ecorys maintains the ISO 9001 standard to ensure this level of quality is consistent and maintained and would recommend its associated Personnel meet or obtain this standard.

## 2.8 Environmental Issues

Ecorys 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 maintains the environmental standard ISO 14001. All Personnel are reminded that they must consider environmental issues in all aspects of their work, including travel and not using unnecessary electricity, water, paper, or other resources.

All Personnel must comply with the Environmental Policy.

## 2.9 Competition

Ecorys believes in vigorous yet fair competition and supports the development and enforcement of appropriate competition laws. Personnel 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.

## 2.10 Reliability of Financial Reporting

Ecorys and associated Personnel's accounting records and supporting documents, such as time charging, and time sheets must accurately describe and reflect the nature of the underlying transactions. No undisclosed or unrecorded account, fund or asset will be established or maintained.

## 2.11 Bribery

Ecorys does not give or receive bribes in any form, in order to retain or bestow business, financial or commercial advantages. Ecorys and its associated Personnel are instructed that any expectation, request, demand for or offer of such bribes, or any corrupt gifts must be immediately rejected and notified.

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

## 2.12 Modern Slavery and Human Trafficking

Ecorys and its associated Personnel support the UK Modern Slavery Act 2015 in all parts of its business and services. We have a zero-tolerance approach to any form of modern slavery and human trafficking, and we undertake appropriate due diligence in our supply chain to ensure that slavery and/or human trafficking are not permitted for any of our companies or associated Personnel.

Personnel must comply with the Modern Slavery and Human Trafficking Policy.

## 2.13 Safeguarding Children and Vulnerable Adults

Ecorys and its associated Personnel are committed to ensuring that children and vulnerable adults that we come into contact with during the course of our work are protected. 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 are 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

Personnel must comply with the Safeguarding Children and Vulnerable Adults Policy.

## 2.14 Confidentiality and Data Security

Ecorys and its associated Personnel are dedicated to maintaining confidentiality of all data, both internal Ecorys data, external client data, supplier data and individual's data and manage all data appropriately and in line with instructions from the data's owner. We respect Data Subject rights and protect all Personal Data in line with regulations, statutory obligations, ethical considerations, consent of data subjects and contractual obligations. Ecorys is working towards ISO 27001 Data Security Standard to provide clients and data subjects with additional reassurance that we take our responsibilities seriously.

Personnel must always comply with Ecorys' Data Protection Policy and Information and Data Security Policy.

## 3. Compliance Measurement

The Responsible Person will verify compliance to this policy through various methods, including but not limited to, business tool reports, internal and external audits, and feedback to the policy owner. It is the responsibility of the Board of Management of Ecorys to ensure that the principles embodied in this Policy are communicated to, understood, and observed by all personnel. The Board of Management of Ecorys will not criticize or blame personnel for any loss of business resulting from adherence to these principles. Equally, the Board of Management of Ecorys undertakes that no employee will suffer as a consequence of bringing to their attention, or that of senior management, a breach or suspected breach of these principles. The UK Whistleblowing Policy sets out the way in which Personnel may raise concerns and the management response to a concern raised in this manner

## 4. Exceptions

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

## 5. Non-Compliance

Personnel found to have violated this policy will be subject to appropriate disciplinary action, up to and including, termination of employment or 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

Conflicts of Interest Register

Information and Data Security Policy

Data Protection Policy

Whistleblowing Policy