

## Anti-Bribery and Anti-Corruption Policy

It is our policy to conduct all of our business in an honest and ethical manner.

We take a zero-tolerance approach to bribery and corruption.

We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate, and implementing and enforcing effective systems to counter bribery.

This policy applies to all Design and Analysis' members' employees, directors, consultants, contractors, agents and joint ventures worldwide.

The purpose of this policy is to:

- I. Set out our responsibilities, and of those working for us, in observing and upholding our zero tolerance position on bribery and corruption, and
- II. Provide information and guidance to those working for us on how to recognise and avoid bribery and corruption.

Good business ethics are integral to who we are and what we do. Everyone who works for or with a member of Design and Analysis must work in a safe, ethical and lawful manner. We must all strive to be professional and accountable in everything that we do at work.

We will not be influenced - we prize our independence and impartiality. This means that we will not seek to influence or be influenced by payments of money or anything of value, corporate hospitality or gifts. Our Code of Ethics makes this clear.

We will uphold all laws which counter bribery and corruption in all the countries in which we operate.

Under English law, bribery and corruption are punishable by up to ten years' imprisonment for individuals and if we are found to have taken part in corruption, we could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation.

In the U.S., the criminal penalties are similarly severe. The US Foreign Corrupt Practices Act of 1977 (FCPA) makes it a crime to give, or to offer to give, anything of value to non-US government officials (including employees of state-owned companies, such as national oil or transportation companies) to improperly influence the performance of the officials' duties. A single violation of bribery under U.S. law could cost a company up to US\$2M in fines and, for individuals, up to 5 years' imprisonment and fines of up to US\$100k per violation. In some countries in the Asia Pacific region, bribery and corruption attracts punishment of life imprisonment, or even in the most serious cases, the death penalty. We therefore take our legal responsibilities very seriously.

It is everyone's responsibility to comply with this policy and raise any concerns regarding bribery or corruption with Design and Analysis' Managing Director through their line of management immediately such issues should come to light.

Thank you for joining us in our commitment to maintain ethical conduct, and in continuing to strengthen Design and Analysis' reputation for independence and honest dealing with all those we come into contact with.

The UK Bribery Act 2010 (effective from July 1, 2011) makes it illegal to give or receive a bribe, bribe a non- UK government official or, as a commercial organisation, fail to prevent bribery. It applies to our conduct everywhere in the organisation. There are similar anti-bribery and anti-corruption laws in many countries around the world.

Carl Woolley  
Managing Director