

Anti-Bribery and Corruption (ABC) Policy

Dunwoodie Architects Limited is committed to the highest ethical standards and requires all employees to be aware of and comply with its policies and guidelines on corporate conduct. Bribery is never acceptable. We operate a strict no tolerance policy towards bribery in all its forms, whether directly or through third parties. We expect our clients and business partners to operate in the same way.

Employees should act with integrity at all times and should not engage in bribery and corruption activity of any kind.

Dunwoodie Architects Limited regards actual or attempted bribery and corruption very seriously, and its policy is:

- To take all appropriate measures to deter bribery and corruption
- To maintain necessary procedures to prevent and detect bribery and corruption
- To encourage employees to report immediately any suspicion of bribery and corruption inline with Dunwoodie Architects Limited's Whistle Blowing policy
- To investigate vigorously all instances of suspected bribery and corruption
- To deal with suspected bribery and corruption as it sees fit, including reporting it to the appropriate authorities, with the intention of pursuing criminal prosecution and/or civil litigation
- To assist the police and other law enforcement bodies in the investigation and prosecution of suspected offenders
- To recover from offenders any assets wrongfully obtained
- To make clear that all employees have a responsibility for bribery and corruption prevention and detection
- To protect employee confidentiality in line with Dunwoodie Architects Limited's Whistle Blowing policy
- To communicate Dunwoodie Architects Limited's Anti Bribery and Corruption Policy to all employees via induction programmes, handbooks, etc

Risk Mitigation:

All Dunwoodie Architects Limited's businesses observe the same controls and procedures with regards to corporate governance. The procedures are reviewed and approved on a regular basis, and include, inter alia, controls over procurement, banking, accounting, tendering, contracts, legal matters, recruitment, and dealing with conflicts of interest. Specific controls include, but are not limited to:

- defined, documented financial processes that must be applied by personnel to mitigate the risk of bribery and corruption
- controls and checks that are embedded within ongoing operations and the processing of transactions
- the segregation of duties between key roles and tiered review and authorisation where relevant
- training for new personnel in the culture of the business and the processes required for their area of operation
- recruitment processes that include the follow up and review of references from former employers, where appropriate

Responsibilities:

Responsibilities under Dunwoodie Architects Limited's Bribery and Corruption Policy may be summarised as follows:

- **Management:** responsible for minimising the risk of bribery and corruption by ensuring adherence to procedures and compliance with controls and for raising awareness of bribery and corruption risks within their business areas and teams. Management should also encourage the prompt reporting of bribery and corruption incidents or suspicions
- **Employees:** responsible for minimising the risk of bribery and corruption by adhering to procedures, complying with controls and reporting any suspicions in line with policy
- **Directors:** Overall responsibility for establishing and maintaining ethical and legal standards
- **Risk Management (RM):** Responsible for initial advice and establishment of ABC committee. RM is also responsible for communicating Dunwoodie Architects Limited's ABC policies and procedures, including developing appropriate training and co-ordinating press releases and other external contact with the Directors, as appropriate.
- **Human Resources:** responsible for advice on dealing with employees throughout an investigation (both suspects and witnesses).