

# Ethical Business and Compliance Policies



## Contents

|  |   |
|--|---|
| 1. Ethical Business Policy                                   | 2 |
| 2. Prevention of Bribery & Corruption Policy                 | 4 |
| 3. Anti-Tax Evasion Policy                                   | 5 |
| 4. Prevention of Modern Slavery and Human Trafficking Policy | 6 |
| 5. Indigenous Relations Policy (Canada)                      | 7 |

## 1. Ethical Business Policy

Tony Gee and Partners LLP provides specialist design services to the construction industry. Our reputation and success depend as much on the way we conduct our business as on our engineering capability. This policy is aligned with a number of our other policies that contribute to creating an ethical business.

Our Executive Board acts to ensure that the aims below are being achieved, and that they are fully implemented through all areas of the business through appropriate process, training and guidance.

Our aims are:

To be a **Responsible** Business:

- we strive to be reliable and carry out our duties to our best ability. Our approach to delivering an excellent service to our clients is set out in our Quality Policy.
- we meet all legal and regulatory requirements as set out in a number of Policies on Health and Safety, Bribery and Corruption, Anti-Tax Evasion, Drugs and Alcohol Use, Data Protection, Prevention of Modern Slavery and Human Trafficking, and Equal Opportunities
- we consider the wider impact of our business as set out in our Social Value Policy and Sustainability and Environmental Policy
- we align with global initiatives such as the UN Sustainable Development goals

To act with **Respect**:

- we interact within ourselves and with others with respect and we consider the expectations and requirements of others as set out in our Bullying and Harassment Policy

To act with **Fairness**:

- we hold all our employees to the same standards as set out in our Indigenous Relations Policy, our Equal Opportunities Policy and our Employee Access Policy
- we maintain zero tolerance for bribery, corruption, or unethical conduct
- we promote fair competition and ensure transparency with clients and stakeholders
- we uphold integrity throughout our supply chain and operations.
- we encourage reporting of suspected wrongdoing through our whistleblowing policy
- we consider sustainable procurement issues when appointing our supply chain

To build **Trust**:

- we provide accurate, reliable advice and take full accountability for our work
- we avoid conflicts of interest and comply with all legal and regulatory standards
- we conduct all business with honesty, transparency, and professionalism.

# Ethical Business and Compliance Policies



As a business, we expect our employees to represent the company in all their interactions with customers and associates. Their conduct at work significantly impacts colleagues and the harmonious operation of the workplace. Therefore, it is essential to maintain appropriate professional, non-adversarial standards of conduct. This is thoroughly explained to employees in our Employee Handbook.

Our company's commitment to the various Policies identified above, in combination with our employees' commitment to ethical conduct as set out by the professional institutions such as the Engineering Council, results in a framework against which we can measure our collective and individual success at maintaining ethical standards.

## 2. Prevention of Bribery & Corruption Policy

### Purpose

It is the purpose of this document to set out the Prevention of Bribery and Corruption Policy of the Firm as required by the Bribery Act 2010.

### General Policy

It is the policy of Tony Gee and Partners LLP:

- To conduct business with integrity in an honest and fair manner, and to expect the same from those with whom we do business.
- That the direct or indirect offer, payment, soliciting or acceptance of bribes in any form (including facilitation payments and improper non-financial advantages) is unacceptable.
- To recognise its obligations to meet all relevant legislative requirements pertaining to corruption which apply to any of the Firm's undertakings both in the UK and overseas, including the Bribery Act 2010.
- To organise and arrange its affairs to ensure compliance with the policy.
- To control, monitor and review the policy at intervals not exceeding 12 months and to revise as necessary in intervening periods to comply with current legislation and changes in the assessment of risk.
- To ensure that training is provided for all staff, both permanent and temporary, appropriate to their potential exposure to bribery and corruption.
- To ensure that all new employees receive induction training on the identification and prevention of bribery and corruption within one month of appointment.

The LLP Members and Management are committed to the implementation of all the contents of this policy and will ensure that adequate resources are made available to ensure compliance. It is every employee, sub-contractor, agent and business partner's responsibility to co-operate fully in the implementation of this policy and to consider it their duty to the Firm, to other employees and to the general public so to comply.

Neglect by any employee, sub-contractor, agent or business partner regarding the Firm's Prevention of Bribery and Corruption Policy will be viewed as a serious breach of its stated aims and may result in criminal proceedings and/ or disciplinary action being taken against such an employee or termination of contracts with sub-contractors, agents or business partners.

The allocation of duties for anti bribery and corruption matters and the particular arrangements that the Firm will make to implement its Policy are set out within the operational procedures contained with the Quality Management System.

Our policy will serve as a constant reminder of our responsibility to conduct business in an honest way, without the use of corrupt practices or acts of bribery.

## 3. Anti-Tax Evasion Policy

### Purpose

It is the purpose of this document to set out the Anti-Tax Evasion Policy of the Firm, in recognition of the principles set out in the Criminal Finances Act 2017.

### General Policy

It is the policy of Tony Gee and Partners LLP:

- To conduct business with integrity in an ethical, honest and fair manner, and to expect the same from those with whom we do business.
- To recognise that the payment of all properly due taxes is vital for creating and sustaining a fair society.
- To have a zero-tolerance approach to all forms of tax evasion, whether under UK laws or the laws of any foreign jurisdiction in which we operate.
- To recognise its obligations to meet all relevant legislative requirements pertaining to the prevention of tax evasion which apply to any of the Firm's undertakings, including the Criminal Finances Act 2017.
- To organise and arrange its affairs to ensure compliance with the policy.
- To control, monitor and review the policy and to revise as necessary to comply with current legislation.

The LLP Members and Management are committed to the implementation of all the contents of this policy and will ensure that adequate resources are made available to enable compliance. It is every employee, sub-contractor, agent and business partner's responsibility to co-operate fully in the implementation of this policy and to consider it their duty to the Firm, to other employees and to the general public so to comply.

Neglect by any employee, sub-contractor, agent or business partner regarding the Firm's Anti-Tax Evasion Policy will be viewed as a serious breach of its stated aims and may result in criminal proceedings and/or disciplinary action being taken against such employee or termination of contracts with sub-contractors, agents or business partners.

The particular arrangements that the Firm will make to implement its Policy are set out within the operational procedures and guidelines contained with the Quality Management System.

Our policy will serve as a constant reminder of our responsibility to conduct business in an ethical and honest manner, and to ensure that all persons associated with the Firm comply with the Firm's values.

## 4. Prevention of Modern Slavery and Human Trafficking Policy

### Purpose

It is the purpose of this document to set out the Prevention of Modern Slavery and Human Trafficking Policy of the Firm, in recognition of the principles set out in the Modern Slavery Act 2015.

### General Policy

It is the policy of Tony Gee and Partners LLP:

- To conduct business with integrity in an ethical, honest and fair manner, and to expect the same from those with whom we do business.
- That all forms of slavery, forced or compulsory labour and human trafficking are abhorrent and unacceptable.
- To recognise its obligations to meet all relevant legislative requirements pertaining to the prevention of slavery which apply to any of the Firm's undertakings both in the UK and overseas, including the Modern Slavery Act 2015.
- To organise and arrange its affairs to ensure compliance with the policy.
- To control, monitor and review the policy at intervals not exceeding 12 months and to revise as necessary in intervening periods to comply with current legislation.

The LLP Members and Management are committed to the implementation of all the contents of this policy and will ensure that adequate resources are made available to enable compliance. It is every employee, sub-contractor, agent and business partner's responsibility to co-operate fully in the implementation of this policy and to consider it their duty to the Firm, to other employees and to the general public so to comply.

Neglect by any employee, sub-contractor, agent or business partner regarding the Firm's Prevention of Modern Slavery and Human Trafficking Policy will be viewed as a serious breach of its stated aims and may result in criminal proceedings and/or disciplinary action being taken against such an employee or termination of contracts with sub-contractors, agents or business partners.

The allocation of duties for the prevention of slavery matters and the particular arrangements that the Firm will make to implement its Policy are set out within the operational procedures contained with the Quality Management System.

Our policy will serve as a constant reminder of our responsibility to conduct business in an ethical and humane manner, and to ensure that all persons within the Firm's supply chain comply with the Firm's associated values.

## Region Specific Policies

### 5. Indigenous Relations Policy (Canada)

Tony Gee provides design services to the construction industry. We are committed through this policy to building meaningful, respectful and mutually beneficial relationships with indigenous communities and businesses, to considering indigenous knowledge in our design approach and, to leaving a positive legacy in the communities we work in.

#### Principles

- **Respect for Indigenous Rights:** Recognize and uphold the inherent legal rights of Indigenous peoples. Honor existing treaties, land rights and self-determination.
- **Education:** Encourage staff awareness and understanding of the culture, history and traditions that make Indigenous peoples and culture unique.
- **Mutual Respect and Partnership:** Foster indigenous business relationships on the basis of mutual respect, trust and collaboration. Endeavour to integrate the knowledge and learnings of Indigenous culture into our work.
- **Recognition:** Recognise that historically, their voices have not been heard and that we must create platforms for Indigenous leaders to share their insights and direction.
- **Humility:** Understand that learning about and from Indigenous culture in an ongoing manner is essential to leaving a positive legacy and to improving our policies and practices.

#### Commitments

- **Engagement and Consultation:** Engage with staff and Indigenous communities regarding projects and activities that may affect their lands, resources, and well-being to find considerate solutions.
- **Employment and Training:** Commit to equal opportunities for Indigenous peoples in our local employment and procurement processes in line with our Equal Opportunities Policy. Work with our clients to offer opportunities to upskill communities local to our projects.
- **Cultural Preservation and Promotion:** Support initiatives that preserve and promote Indigenous languages, cultures, and traditions.
- **Business Development:** Meaningfully and respectfully consider engaging with Indigenous-owned service providers in our business decisions in line with our Social Value Policy.
- **Environmental Stewardship:** Collaborate with Indigenous communities to promote sustainable environmental practices and respect their traditional ecological knowledge in line with our Sustainability and Environmental Policy.

Tony Gee Management hold accountability for reviewing, delivering and promoting awareness of this policy. We will use industry standard mechanisms for monitoring the effectiveness of this policy, solicit feedback from Indigenous partners and make necessary improvements and updates to the policy when required.

# Ethical Business and Compliance Policies



**Signed:**

A handwritten signature in blue ink that appears to read 'Alasdair M. Fowler'.

Alasdair Fowler  
Chief Executive Officer

**Signed:**

A handwritten signature in blue ink that appears to read 'Jon Powell'.

Jon Powell  
Managing Director (Canada)

**Reviewed Date:** 12 January 2026

**Document No:** POL-AD-002

**Revision:** 01

## Revision History:

| Rev | Date       | Description                |
|-----|------------|----------------------------|
| 01  | 12/01/2026 | First Issue revised format |
|     |            |                            |
|     |            |                            |