

# Anti-Bribery Policy

## Policy Statement

This statement of the company's policy on bribery applies to companies in the Buro Happold Group. For convenience in this document "Buro Happold" means all of these companies.

Buro Happold regards bribery and corruption as totally unacceptable. Its Anti-Bribery Policy extends to all the company's business dealings and transactions in all countries in which it or its subsidiaries and associates operate.

The policy is implemented through a detailed anti-bribery programme which is regularly reviewed to ensure any changes in law in the UK and elsewhere are taken into account. All directors and employees of Buro Happold are required to comply with the policy.

In summary, we will:

- Effectively manage and monitor our anti-bribery procedures within Buro Happold;
- Ensure a systematic approach to risk assessment of the nature and extent of bribery risks associated with our industry and global market;
- Ensure a systematic approach to the monitoring of the activities of our suppliers, agents, intermediaries and fellow participants in consortia and joint ventures in relation to their anti-bribery commitments;
- Increase and maintain at a high level the awareness of all staff of their responsibility for complying with the policy and for monitoring compliance of suppliers, agents, intermediaries and fellow participants in consortia and joint ventures;
- Ensure that our suppliers, agents, intermediaries and fellow participants in joint ventures are fully aware of their responsibility for and are committed to complying with our anti-bribery policy;

- Provide adequate resources, including the provision of competent personnel, to enable the implementation and management of this policy;
- Provide information, instruction and training as necessary, to all who need it;
- Provide a route for communication for all employees to allow the reporting of allegations of bribery in a safe and confidential manner to a designated senior manager;
- Provide suitable arrangements for staff consultation on matters relating to bribery.

Buro Happold also recognises that good practice in relation to bribery is the responsibility of everyone within the organisation and is not merely a function of management. Management has specific duties and responsibilities to comply with the letter and spirit of the policy. Continual improvement in anti-bribery procedures will be sought and procedures and suggestions from employees to this effect will be welcomed and should be submitted to the designated senior manager. Buro Happold will keep this policy up to date. To ensure this, the policy and its operation will be reviewed at least annually and amended as necessary. The policy may be reviewed more frequently in the light of significant changes in legislation or guidance.

The Chief Executive Officer and the Board fully endorse this Policy.



Gavin Thompson,  
Chief Executive Officer  
28 February 2011