

# Business Integrity Code of Practice

# Business Integrity Code of Practice

This Business Integrity Code of Practice applies to all external parties we engage with.

# Contents

<b>Introduction</b>	<b>05</b>
<b>Message from the Global Ethics Director</b>	<b>06</b>
<b>Speak Up Procedure (Whistleblowers)</b>	<b>08</b>
<b>Health, Safety and Wellbeing</b>	<b>09</b>
<b>Straight and honorable dealings</b>	<b>12</b>
Bribery & corruption	12
Gifts & hospitality	12
Fraud	13
Agents & representatives	13
Modern slavery	16
Tax evasion	16
<b>We act openly and fairly</b>	<b>18</b>
Open and fair competition	18
Conflicts of interest	18
Political activity	19
Sanctions	19
<b>We protect personal information and assets</b>	<b>20</b>
Data privacy	20
Confidential information	20



# Introduction

Core to Arup's values is to act honestly and fairly in all of our dealings. This includes complying with laws and regulations, meeting our commercial commitments with our clients and other stakeholders and adhering to Arup's own policies and procedures. This also involves ensuring ethical conduct – individually and corporately. We are also committed to collaborating with third parties whose values are consistent with our own. This includes joint venture and alliance partners, clients, sub-consultants and suppliers.

This Business Integrity Code of Practice seeks to address key regulatory and other important requirements impacting Arup's business. In addition to providing guidance on matters of ethics (such as whether to accept gifts and hospitality), the Code of Practice sets Arup's expectations in respect of privacy & data protection, conflicts of interest, confidentiality, and other matters.

Arup's people are encouraged to not let a question go unanswered and not to let unacceptable conduct go unchallenged, whether that behaviour be from someone in Arup or a third party. Arup will always support its people for doing the right thing.

# Message from the Global Ethics Director

Ever since our firm was established, thousands of Arupians have built our reputation for excellence and innovation, underpinned by our commitment to working fairly and honestly.

However, the world in which we work is becoming increasingly complex, and this presents many challenges to our ways of working. It is now more important than ever that we stay true to our aim of straight and honourable dealings.

Reputations are increasingly hard to win, and easy to lose. Trust is fundamental to our future success. This means that we need to think carefully about who we work with and on what projects we work. And when we make decisions in our day-to-day working lives, we must ask ourselves “are we making the right choice?”

That is why our Business Integrity Code of Practice is so important. It describes what we mean by integrity, openness, and fairness, but beyond that, it sets out the behaviours we expect of ourselves – as peers and members of Arup – as well as of the people we collaborate with.

Making the right choice has never been more important.

**Fergal Whyte**  
Global Ethics Director

---

**Further Information**

Arup.com provides information including for example our Ethical Conduct Policy, Health, Safety and Wellbeing Policy, and our Modern Slavery and Human Trafficking Statement.



# Speak Up Procedure (Whistleblowers)

We are committed to a culture of transparency.

## **What do we mean?**

Our Speak Up Procedure represents a mechanism for sharing your concerns about Arup's, or one of its members, behaviour. You may have the option to make anonymous contact, although this may be subject to local laws.

For more information, and to make a disclosure, please open the full Speak Up Procedure found on [Arup.com](https://www.arup.com).



# Health, Safety and Wellbeing

As a minimum we comply with legal and other Health, Safety and Wellbeing (HSW) requirements in all the locations where we operate. Through our behaviours and actions, we aim to make a positive contribution to HSW in the industries and locations we work in.

## **What do we mean?**

We care about our people, our communities and those that we influence by our actions. We prioritise a safe and healthy working environment for our people; in our offices, on site and travelling on business. We promote the importance of health, safety, and wellbeing, and strive for zero harm both within the workplace and through our activities.



**Safety on site**

© Arup



# Straight and honourable dealings

## Bribery & corruption

We will not give or receive bribes or participate in corrupt activities.

### What do we mean?

We won't knowingly participate in any form of bribery or corrupt behaviour, either directly or through third parties. This includes offering, giving or knowingly receiving bribes. It extends to improper payments including facilitation payments, even if this is perceived as part of local business practice.

## Gifts and hospitality

We make sure gifts and hospitality are reasonable and don't improperly influence us.

### What do we mean?

To foster goodwill or working relationships, Arup people may occasionally receive or offer gifts or hospitality. Hospitality includes invitations to social functions, sporting events, meals, or entertainment.

Any gifts or entertainment should be of an appropriate value, occur occasionally and be appropriate in all circumstances. Any hospitality offered or received must have a legitimate business purpose.

## Fraud

We will be truthful and straightforward in our dealings, seeking never to defraud anyone.

### **What do we mean?**

Fraud is deception intended to result in financial or personal gain and can lead to both civil and criminal liability. In some countries, an individual can be prosecuted merely for being careless or reckless in allowing fraudulent activity, even though they didn't deliberately set out to commit fraud themselves.

Our systems are set up to enable all staff to conduct our business affairs safely and securely. However, as we work with increasingly complex contracting frameworks and supply chains, it is important to stay alert to such issues and take steps to address any concerns.

## Agents and representatives

We use agents or representatives where necessary and shall require them to act in accordance with our Business Integrity Code of Practice.

### **What do we mean?**

Agents and third-party representatives provide help, advice and local knowledge that can be essential to our business activities. We are responsible for ensuring they operate in accordance with our Business Integrity Code of Practice. Ignorance of what others are doing on our behalf or in our name is no excuse.





## Modern slavery

We treat people respectfully and maintain ethical business standards in all the markets in which we operate.

### What do we mean?

Modern slavery is an overarching term that includes forced labour, servitude, slavery, and the trafficking of people. In certain countries, there are regulatory requirements prohibiting such activities.

We work with our clients, partners and collaborators including sub-consultants and other suppliers of services and equipment to seek to ensure modern slavery does not feature in our supply chain.

## Tax evasion

We do not facilitate tax evasion.

### What do we mean?

Tax evasion is an illegal Practice whereby an underpayment or a non-payment of tax occurs because of action or inaction with a fraudulent intention.

Arup carries out its business activities in compliance with relevant tax laws and we will not knowingly engage in, or otherwise facilitate, tax evasion.





# We act, openly and fairly

## Open & fair competition

We believe in open and fair competition and seek competitive advantage only through fair and lawful means.

### What do we mean?

Anti-competitive behaviours are business Practices that limit or prevent competition in a market.

Arup will not engage with a competitor in respect of pricing or agree to any other form of anti-competitive behaviour (whether verbally or in writing).

## Conflicts of interest

We avoid or manage situations where our roles or actions could create actual, potential, or perceived conflicts of interest.

### What do we mean?

Conflicts of interest (COI) arise when two or more interests compete, potentially compromising our judgement or independence. The conflict can be where we are working for different clients whose interests conflict or involve an individual's interests conflicting with those of Arup or a client.

Arup monitors for actual, potential or perceived COI during a project's lifecycle and implements appropriate controls to manage identified COI.

## Political activity

We make sure any political activity on behalf of Arup is lawful, ethical, and approved.

### What do we mean?

Arup's funds or facilities are not to be used to make political contributions to any organisation or candidate for public office.

As individuals, our people may choose to contribute financially to political campaigns (using personal funds) or volunteer time in support of political campaigns. However, our people must not use Arup's time or resources to do so, and we must never appear to represent Arup or its views when engaging in personal political activities.

## Sanctions

We comply with recognised sanctions.

### What do we mean?

Sanctions (which include embargoes) seek either to limit or prevent trade with, or within, specific countries or with specific entities or individuals.

Arup will not knowingly carry out activities that would breach sanctions laws and regulations in the jurisdictions in which Arup operates.



# We protect personal information and assets

## Data privacy

We protect personal information and comply with data protection and privacy laws.

### What do we mean?

Data protection and privacy laws regulate the collection, storage, disposal, use and disclosure of personal information that can identify a person (such as name, address, date of birth, national insurance or social security number, job title, photographs). Laws vary from one country to another. Wherever Arup gathers, holds and uses personal information, we must always comply with the relevant country's data protection laws.

Arup is transparent about the collection, use and disclosure of personal information. We seek to collect it lawfully, collect and use only the personal information we require, only keep it for as long as truly necessary and for an agreed business purpose.

## Confidential information

We keep confidential information belonging to Arup, clients and other third parties secure and only share or disclose it if appropriate to do so.

### What do we mean?

Arup keeps confidential information secure, shares it internally only on a 'need to know' and authorised basis, and discloses it to a third party only as permitted and on a confidential basis and with appropriate authorisation. Any contractual duty to maintain confidentiality must be complied with.

**Author**

Arup Business Integrity Team

[arup.com](http://arup.com)

**Published**

The Business Integrity Code of Practice is reviewed annually or sooner if required.  
This current version is dated January 2025.