ARUP

Speak Up Procedure – Whistleblower

Arup Americas Region's Speak Up Procedure is available to make a disclosure about misconduct or an improper state of affairs in our business.

This includes the following kinds of conduct relating to our business:

- Fraud
- · Corruption and bribery
- Other illegal conduct, whether criminal or civil in nature
- Conduct in breach of Arup's <u>Ethical Conduct Policy</u> or the internal Business Integrity Code of Practice
- Any other kinds of conduct that amounts to misconduct or an improper state of affairs in relation to any of the Arup companies in the United States, Canada, or Colombia (the Americas Region).
 Conduct does not have to be in breach of the law in order for a disclosure to be made.

This procedure does not apply to concerns you might make about 'personal work-related grievances.'

These are concerns, issues or problems you have that relate to current or former employment with Arup and which have implications for you personally but do not have implications for Arup's Americas Region companies or other employees and/or do not relate to any of the type of conduct set out above. Some non-exhaustive examples of personal work-related grievances include concerns about:

- Interpersonal conflict between you and another employee
- Disciplinary action
- A promotion or transfer

The following people can make disclosures of the kind referred to above:

- Current or former officers or employees of any of the Arup companies in the Americas Region
- Current or former suppliers or contractors to any of the Arup companies in the Americas Region (including without limitation an employee of the supplier, consultant or service provider)

It offers an avenue for sharing your concerns about the business' or an individual's behaviour. You may have the option to make anonymous contact, although this may be subject to local laws.

We are committed to a culture of transparency and encourage those who fall into one of the categories of people outlined above to speak up about their issues and concerns, through our Speak Up Procedure.

If you have a concern, don't ignore it; let us know. You could prevent a potentially serious situation from harming you, our organisation and others.

Click here to make a Speak Up Disclosure.