



DAR AL-HANDASAH (SHAIR AND PARTNERS)
ANTI-BRIBERY AND CORRUPTION POLICY STATEMENT

Dar Al-Handasah (Shair and Partners) (Dar Al-Handasah) is committed to adhering to the highest standards of ethical behaviour in the conduct of our business across the globe. We have a zero tolerance of bribery or corruption in any form.

We are committed to planning, designing and engineering sustainable enhancements to existing environments, and in fostering long-term relationships with our clients, founded in trust and ethical business practices. We strive to exceed the expectations of our clients and the communities we serve through honesty, integrity, technical excellence, and with the pride that we have in our work.

Bribery and corruption cause poverty and suffering, inhibit economic growth and are damaging to business. They can also expose Dar Al-Handasah, our employees and our business partners to reputational harm and criminal prosecution. Dar Al-Handasah, therefore requires our employees, directors, and persons working for or on behalf of Dar Al-Handasah, to adhere to our Anti-Bribery and Corruption Policy (the Policy).

The core features of the Policy are set out below:

1. **Prohibition of bribery:** Dar Al-Handasah prohibits bribery and corruption in any form, including facilitation payments (i.e. “grease” or “backhanders” payments that the recipient is not legitimately entitled).
2. **Gifts, hospitality and travel:** The Policy prohibits the giving or receiving of gifts, hospitality or travel where doing so might, or be perceived to, improperly influence a business decision. Any form of gifts, hospitality, travel or other advantage offered and received must be subject to an assessment on its acceptability and appropriateness regardless of the amount or value. Interactions with public officials are, under the Policy, subject to heightened attention and stricter conditions.
3. **Charitable contributions and sponsorship:** Dar Al-Handasah believes strongly in its corporate social responsibility programmes and in making a positive contribution to society. The Policy supports this commitment by setting out the controls we have in place to ensure that charitable donations and sponsorship are not a subterfuge for bribery and are made in compliance with applicable laws.
4. **Political contributions:** The making of political contributions with Dar Al-Handasah's funds or on behalf of Dar Al-Handasah is prohibited.
5. **Hiring and visas:** Dar Al-Handasah has in place human resources policies that ensure all hiring decisions are made on the merits and qualifications of the candidate. Internships, employment and sponsorship of visas are not to be provided to gain an improper business advantage.
6. **Public officials:** Interactions with public officials are, under the Policy, subject to heightened attention and stricter conditions.
7. **Risk assessment and due diligence:** The Policy requires a risk assessment to be undertaken before Dar Al-Handasah engages or renews an engagement with a person working for or on behalf of Dar Al-Handasah. Where risks are identified (e.g. because of the nature of the transaction or the place where services are to be performed), due diligence is required. Those working for or on behalf of Dar Al-Handasah are required to certify annually that they have complied with the Policy.
8. **Payments, books and records:** Payments to any third party shall be appropriate remuneration for legitimate services effectively rendered and be made in accordance with Dar Al-Handasah's financial control policies. The Policy prohibits the making of any false or misleading accounting entries.
9. **Reporting suspicious activity:** The Policy provides a procedure for the reporting of suspicious activity. There will be no detriment to anyone who reports an actual or suspected breach of the Policy in good faith. Any attempts to deter individuals from raising concerns, or any subsequent retaliation against individuals who speak up, will be treated as a serious disciplinary offence.



10. **Training and guidance:** Training is provided to employees and, where appropriate, third parties providing services to Dar Al-Handasah. Senior management and the compliance team are also available to provide guidance where required.
11. **Monitoring and updates:** Compliance with the Policy will be monitored by Dar Al-Handasah's board and the Policy will be updated as required to respond to any changes to legislation and the risks posed to Dar Al-Handasah's business.

Dar Al-Handasah is committed to complying with laws and regulations designed to combat bribery and corruption. Personnel who engage in or facilitate bribery, or who fail to comply with all applicable anti-bribery laws, regulations, and the Policy, may be subject to disciplinary action. Dar Al-Handasah also reserves the right to terminate immediately any business relationship that violates the Policy.

A handwritten signature in black ink, appearing to read 'T. Shair', written over a horizontal dotted line.

Talal Shair

Chairman