

Statement of Business Ethics

At Hewson Consulting Engineers we are committed to conducting business with integrity by being open, honest, honourable and transparent in everything we do. Our vision is for our core behaviours to be totally embedded within our business culture and procedures.

We will show respect for human dignity and the rights of the individual, as well as respecting traditions and cultures. Where business practices vary in different countries, we will obey the law and act responsibly in international trade and business practice. We will seek to ensure consistent procedures wherever practical, which may also exceed the strict requirements of local legislation.

This means that we will not tolerate business misconduct, including bribery or corruption. We will work with regulatory authorities in all the jurisdictions in which we operate to ensure that we comply fully with all legislation (including the UK Bribery Act 2010) and reporting requirements. We encourage anyone who has concerns about the behaviour of the Company or any individual associated with the Company to report their concerns.

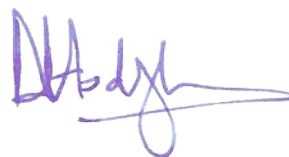
How we conduct our business is underpinned by our Code of Conduct which clearly sets out expectations based on the following principles:

- employees using their judgement and common sense to consider if a benefit is excessive, if it is a gift, bribe, hospitality or seeking to unduly influence;
- providing a confidential procedure for anyone to report any concerns regarding misconduct including, but not limited to, breaches of law, bullying or harassment, health, safety or environmental exposure, financial exposure, unauthorised disclosure of personal or confidential information and deliberate concealment of any such matter;
- an appointed Business Ethics Representative reviewing concerns raised through the confidential reporting procedure to make sure that matters receive independent investigation, as necessary;
- maintaining a register of all sponsorship and charitable giving and making such information available on request.

Signed:

A handwritten signature in blue ink, appearing to read 'N Hewson'.

Nigel R Hewson
Director

A handwritten signature in blue ink, appearing to read 'A Hodgkinson'.

Andrew P Hodgkinson
Director

Date: 3 January 2017