CDB Consulting Engineers Limited

Mechanical, Electrical & Public Health Design Engineers 4th Floor, 59 Piccadilly, Manchester, M1 2AQ



Document No. CDB 200-091

Date: 1st October 2012

EQUAL OPPERTUNITY, ETHICS AND BUSINESS PRINCIPLES POLICY

Statement of Business Principles

CDB Consulting Engineers Limited (CDB) policy, as a socially responsible company, is to conduct all business affairs in accordance with the highest business & ethical standards, to comply with all applicable laws, and to be a good corporate and Equal opportunities provider.

The Statement of Business Principles is available to all employees.

CDB has implemented a robust compliance, Equal opportunity and ethics programme. A framework of internal controls processes and principles that work together to provide reasonable assurance of CDB compliance with applicable legal and regulatory requirements, as well as the Company's corporate policies.

The Head of **Compliance** has been appointed and oversees the companies Head of Departments who are responsible for providing overall strategic direction, expertise and leadership for equal opportunity, ethics and compliance across the company, acting as an interface with employees. All of Company directors in addition help guide employees in equal opportunities, ethical business dealings and provide information about the company's policies and compliance programs

ACTIONS

A dedicated program on Corporate Social Responsibility has been implemented to monitor the respect by our business partners of equal opportunity and ethical business standards..

CDB Statement of Business Principles (which may be updated from time to time and available on request), agrees to apply the principles set forth therein with respect to performance of this contract and in particular with reference to non-discrimination of employees, combating bribery of domestic and foreign public officials, protection of international human rights and environmental responsibility.

1. The Statement of Business Principles is available to all employees.

2. CDB has implemented a robust compliance Equal opportunity and ethics program. Which has a framework of internal controls, processes and principles that work together to provide reasonable assurance of CDB's compliance with applicable legal and regulatory requirements, as well as the Company's corporate policies.

COMPANY PRINCIPLES

Commitment to Human Rights, the Environment and Social Responsibility

"CDB supports and respects, within its sphere of influence, the protection of international human rights set out in the United Nations' Universal Declaration of Human Rights, the International Labour Organisations fundamental conventions and the Global Compact. In particular, the Company supports the effective elimination of all forms of compulsory labour and child labour and will make this a criterion in the selection and management of its suppliers and contractors."

- 1. Support and respect the protection of internationally proclaimed human rights.
- 2. Uphold the freedom of association and the effective recognition of the right to collective bargaining.
- 3. Uphold the elimination of all forms of forced and compulsory labour.
- 4. Uphold the effective abolition of child labour.
- 5. To ensure no complicity in human rights abuses

Agents, Consultants and Business Partners

"CDB uses only those business partners, consultants, contractors, representatives, sales and marketing agents or suppliers (collectively referred to as "Agents, Consultants and Business Partners") who have met or exceeded the Company's high standards and entered into the appropriate written agreements in strict compliance with the Company's global policies and procedures.

6. Uphold the elimination of any discrimination in respect to employment and occupation.

Respect for a diverse culture

"CDB employees must not discriminate against each other, including for reasons of age, disability, ethnic origin, gender, race, religion or sexual orientation."

7. Support a precautionary approach to environmental challenges

CDB 221.001 - Environment, Health and Safety Policy Refers (Sections 1, 2 and 3)

Section 1

"CDB is committed to operating in a manner that protects the environment and the health and safety (EHS) of employees, contractors, customers, and the communities where we conduct business. Meeting this commitment is a primary management objective and the individual and collective responsibility of all employees and will be proactively communicated internally and externally through our Corporate Social Responsibility efforts."

In particular, CDB commitment is to:

- Incorporate into Design (where possible), products that are safe, energy-efficient, can be installed/serviced/uninstalled safely and can be recycled or disposed of in an environmentally responsible manner.
- Strive to efficiently and effectively prevent pollution and minimize the EHS impacts from activities, services and products.
- Promote the adoption of similar principles by contractors and suppliers.

8. Undertake initiatives to promote greater environmental responsibility

Section 2

"Promote the adoption of the same principles by its Designs, and through its client's contractors and suppliers."

9. Encourage the development and diffusion of environmentally-friendly technologies.

Section 3

CDB will:

- "Comply with applicable EHS laws, regulations, directives, commitments with customers, company requirements, and with other requirements to which CDB subscribes;
- Provide employees and those who visit or work at CDB locations with safe working conditions;
- Design and incorporate products that are safe, energy-efficient, can be installed/serviced/uninstalled safely, and can be recycled or disposed of in an environmentally responsible manner; and

• Strive to efficiently and effectively prevent pollution and minimize the EHS impacts from activities, services and products."

10. Work against all forms of corruption, including extortion and bribery environment anti-corruption.

Our Clients

CDB is committed to maintaining our customer's trust and respect. CDB Consulting Engineers Ltd competes fairly, honestly and by delivering superior products and services to our customers. CDB does not authorize, condone, encourage or promote, directly or indirectly through others, unlawful, unequal or unethical behaviour, such as bribery, kick-backs, pay-offs, promises to pay cash or things of value, or any other activities that may be construed as being corrupt, unlawful or unethical.

Competitors

CDB compete vigorously and fairly and comply with applicable anti-competition laws to ensure our goods, services and Designs are provided on their merits.

Only lawful means of obtaining information about our competitors may be used.