

UK SUPPLIER CODE OF CONDUCT

January 2021



1. Introduction

Arcadis has global and regional procurement functions that complement our business professionals and that align with our mission to create exceptional and sustainable outcomes for our clients in natural and built assets. They also serve to reduce possible supply chain risks for Arcadis.

Our procurement teams focus on the products and services Arcadis sources on behalf of clients in the projects it undertakes on their behalf and on products and services procured in support of its own corporate functions.

The scope of this policy is the UK Region and it covers all the operations of Arcadis N.V. and its subsidiaries.

In pursuit of our mission we are committed to four core values in everything we do: Integrity, Client Focus, Collaboration and Sustainability.

In support of our core value of Integrity, we operate under a set of general business principles and associated compliance practices to which every employee of Arcadis must adhere.

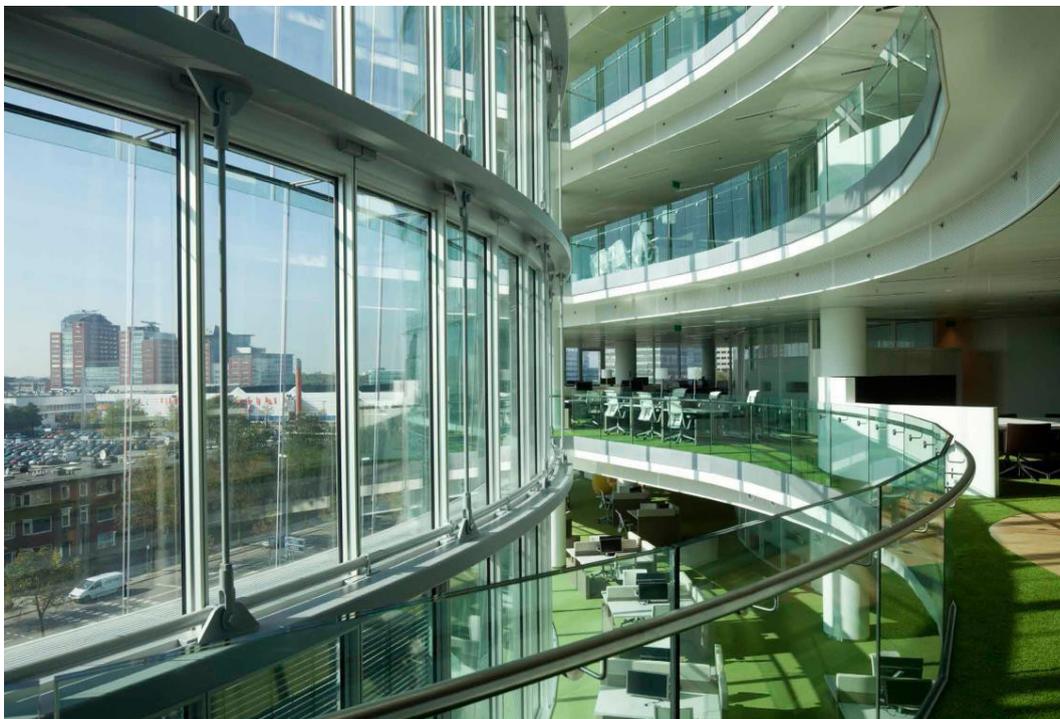
This UK Supplier Code of Conduct has been designed to support our procurement teams in their endeavor to ensure that all suppliers selected via Procurement led sourcing are chosen based on our business principles and associated compliance practices and that suppliers adhere to them while performing business with or on behalf of Arcadis. The procurement teams will also provide support to client facing teams to enable similarly robust sourcing aligned to these principles and practices.

Our business principles cover the broader spectrum of commitments that we have towards society, clients, shareholders and employees, including our pledge to comply with national laws and respect local cultures, promote environmental interests, support free enterprise and fair trade, which all align with our core values of Integrity and Sustainability.

This UK Supplier Code of Conduct outlines the most relevant purchasing principles for Arcadis suppliers.

In addition, Arcadis is a member of the UN Global Compact (UNGC) since 2009 and is committed to both its objectives, as well as the ten UNGC universal principles regarding human rights, labor standards, environmental stewardship, and anticorruption.

Where relevant, our values, mission, and strategy are aligned with the UNGC principles, and we expect the same from our suppliers.



1. Procurement Principles

COMMITMENT TOWARDS SOCIETY AND THE ENVIRONMENT

- We expect our suppliers to be sufficiently embedded in local communities to deal with dilemmas within the bounds of applicable law and ethical responsible business conduct. We also expect suppliers to act in accordance with the ten principles set out in the United Nations Global Compact, to which Arcadis belongs. In this respect, together we can support the principle of open dialogue and cooperation with all relevant parties involved.
- We aim to select suppliers and prefer to award business to suppliers and subcontractors who are committed to contributing to our passion to improve quality of life. In executing projects on behalf of our clients, we therefore give due regard to environmental and social aspects and expect the same from our suppliers whether it's our commitment to using suppliers with strong environmental credentials for office products or encouraging the selection of suppliers with strong environmental programs through our qualification and selection processes. We continuously pursue opportunities to further reduce any adverse impact of our activities on the environment and seek for our suppliers to behave similarly.
 - We expect suppliers to show respect for the environment and comply with applicable environmental laws. This includes you having systems in place to ensure safe management of waste, air emissions and wastewater discharges and the use and handling of hazardous substances, just as we do. Where appropriate, Arcadis will use selection criteria showing preference to suppliers who seek ways to minimize the use of non-renewable resources, use all resources more efficiently and minimize the environmental and social impact of their activities. Sustainability is a goal in our policies and while conducting our services we flow down these requirements into our supplier contracts and may also make it clear that these are to be flowed down to your suppliers accordingly for us to do business with you.
 - Depending on your role for Arcadis or our end client, we prefer you to work from LEED/BREEAM (or comparable) certified office buildings with good access to public transportation, encourage the use of public transportation among employees, have lease fleets with the most up to date sustainable vehicle choices, and work with energy-efficient equipment.
- In addition, we strive to achieve zero incidents relating to Health & Safety (H&S) in everything we do - ensuring the health, safety & well-being of our employees, and other stakeholders. We are fully committed to making our business a healthy and safe place to work. Our supply chain partners play a key role in this.
 - Based on Arcadis' best in class H&S culture and performance, we integrate H&S standards and best practices into our solutions to manage risk to prevent injury and ill-health and bring the best outcomes for our employees and clients.
- At all levels in the organization, we strive to ensure that appropriate resources are provided to reduce and control risks and impacts, and that processes, procedures and systems of work are maintained to the standards outlined in this policy document. Positive decision making and the right behavioral outcomes underpin our approach to Health & Safety, an ethos which is encouraged and reinforced across all levels of our organization as a priority. Our employees are encouraged to positively steward H&S, take personal ownership and adopt a "if not me, then who?" approach to H&S matters.
- We expect you to have proper training and development programs for your people, promote healthy & safe work practices and behavior among your people, among other aspects. We also expect you to be able to document these commitments over time which may include: Supplier (sub-contractors) occupational health and safety programs, policy commitments, pre-screening for safety performance and risks, guidelines for sub-contractor safety management, safety training, evidencing compliance with safety guidelines being included in contractual agreements, objectives or targets, monitoring & reporting documentation.
 - Arcadis support the principle of free enterprise and fair competition as a basis for conducting our business and we observe applicable competition laws and regulations and expect our supply chain to do likewise. You may promote, defend and support your legitimate business interests in the countries in which you operate but expect you to do so with due regard to the law and the interests of society.
 - As an Arcadis supplier you may be invited to participate in community activities and are encouraged to do so unless such participation conflicts with discharging your services for Arcadis.

SUPPORTING OUR COMMITMENT TOWARDS CLIENTS

- Arcadis is a reliable partner for our clients as they pursue their valid business goals and we carry out our services with professional integrity; whilst not jeopardizing the interests of society, employees and shareholders; and our supply chain must align to support this approach. We offer our services under contracting terms that do not interfere with our independent professional judgement and objectivity and often flow these terms into our supplier contracts.
- Projects and clients can be diverse and change regularly so it is always good to talk and be transparent to Arcadis about any potential conflicts of interest that could emerge during the execution of your services.
- We expect you to avoid actual or apparent conflicts of interest between personal and professional relationships, which includes financial or control interests in other companies or other commitments you have whether to competitors of Arcadis, clients or otherwise that would make it difficult to perform your work for Arcadis objectively and effectively.
- As a supplier, we expect you to understand that personal favors can only influence the business relationship negatively and that business decisions are based solely on benefits to the Company and not on considerations of past or future personal gain.
- Where appropriate, have steps in place for the identification, mitigation and prevention of the use of Counterfeit, Fraudulent and Suspect Items (CFSI)
- We expect that you identify, mitigate and manage the risks associated with Modern Slavery and take steps to ensure this is reflected within your supply chain

SUPPORTING OUR COMMITMENT TOWARDS OUR SHAREHOLDERS

- You will conduct your operations in accordance with internationally accepted principles of good governance.

SUPPORTING OUR COMMITMENT TOWARDS EMPLOYEES INCLUDING HUMAN RIGHTS AND LABOR RIGHTS

- As a member of UN Global Compact, we adhere to the principles of this organization and expect our supply chain to do so as well. For this purpose, Arcadis has developed a Human Rights and Labor Rights Policy, which has been published on the company's website to which we refer for more detailed information. We want our suppliers to respect the human rights and labor rights of your employees and of other stakeholders which are touched by your business activities and prefer that you adhere to or develop your own policies which align with the Arcadis Human Rights and Labor Rights Policy.
- Within Arcadis, every employee has an equal opportunity for personal recognition and career development, regardless of personal background or belief and we encourage you to approach your employees in the same manner. It is important to remember that no form of discrimination or harassment will be tolerated in your interactions with Arcadis employees during the execution of your services.
- We expect that as a supplier to Arcadis, all UK Right to Work checks are conducted and that all employees are legally entitled to work in the UK

COMMITMENT OF YOUR EMPLOYEES

- We welcome collaborative and innovative relationships with our supply chain. If you or your employees have ideas that help you deliver your goods or services in a manner better aligned to our business principles or you feel that you can offer insight or support on matters relating to Sustainability or the latest legislation, we welcome you to engage with your regional team and likewise we are happy to engage on such areas with you. Remember that being a preferred or approved supplier to Arcadis means that we value that relationship and are always open to dialogue.
- Please remember that you are responsible for the proper use, protection and conservation of Arcadis' assets and resources that are made available to you. This includes Arcadis' properties, assets, proprietary interests, financial data, company know-how and information and other Arcadis' rights. Arcadis' assets and resources are to be used solely to pursue and achieve the delivery of your goods or services to Arcadis goals and not for personal benefit. A person who believes he or she might have a conflict of interest should discuss the issue with their contact at their regional Arcadis team to raise this with us.
- Arcadis regard information at our business as a company asset that must be protected against loss of availability, infringement and improper disclosure and we expect our suppliers to view information in the same way. Company information also includes intellectual property of Arcadis (inventions, know-how, trade secrets, technical information).
- With more information being shared between businesses Arcadis is committed to ensuring compliance with data protection laws and ensuring that data is handled correctly by our supply chain. As a supplier you shall comply with all applicable laws and regulations while processing personal data, including the requirements of Regulation 2016/679/EU of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (GDPR) and the Data Protection Act 2018.

SPECIFIC INTEGRITY-RELATED COMMITMENTS AND FINANCIAL/ETHICS/LEGAL REQUIREMENTS

- We maintain records of our (trans)actions in an accurate and transparent manner. No unrecorded funds or assets will be established or maintained and we expect you to do likewise.
- Bribes in any form are unacceptable. Bribery can include the explicit and implicit offering, promising, or giving a payment or other advantage to a public official or a private client as undue consideration to influence selection procedures or other government or company decisions. You should immediately reject any demand or offer for such a bribe.
- Gifts or payments, in whatever form, should never be given or received where it is intended to or would appear to obligate the recipient. To avoid even the appearance of impropriety, gifts or favors of any material commercial value should not be made to or be accepted by an Arcadis employee. If you are in doubt, speak to your regional Arcadis team.
- The making of facilitating payments in delivery of your duties for Arcadis is not permitted even if local laws and regulations permit. Facilitating payments are small payments made in money or in kind that are made, in accordance with publicly known and widely followed local custom and practice, in conjunction with the performance by officials in documentation, customs clearance and other matters of routine governmental actions. A characteristic of facilitating payments is that the service obtained as the result of such payment represents the legitimate function of the official concerned. Taking advantage of a formal publicized "fast track" procedure operated by a government department, whereby an additional advertised payment is made to expedite a process is not a facilitating payment.
- Arcadis are fully dedicated to the proper fulfilment of our jobs and avoid any conflict. Any engagement and any financial interest (direct or indirect) which could give rise to a personal or financial conflict with Arcadis' interests, must always be promptly disclosed to your regional Arcadis contact.
- Arcadis is a member of UN Global Compact and we expect you as a supplier to familiarize yourself with and operate your business wherever possible in keeping with the principles outlined by that organization which can be found here: <https://www.unglobalcompact.org/what-is-gc/mission/principles>

2. Observance of this Code of Conduct

- Arcadis considers it essential that all suppliers understand and comply with this “Supplier Code of Conduct”.
- Your management teams should install adequate processes to inform staff of the Supplier Code of Conduct, and are responsible for fostering a culture in which it can be observed.
- This Code of Conduct does not try to provide pre-packaged solutions to every type of dilemma your business faces whilst discharging your duties as a supplier to Arcadis, but aims to provide direction to appropriately respond to dilemmas. Furthermore, it should be clear that dilemmas must be discussed: nobody should be alone in dealing with dilemmas and possible compliance issues and we are always here to talk.
- This Code of Conduct describes the minimum requirements to which suppliers to Arcadis must adhere and is based on the general business principles to which employees of Arcadis must adhere. Depending on regional differences in standards or client requirements, they leave management of Arcadis regions and countries free to specify further local rules of business conduct within the framework of the Code of Conduct and within the contracts of suppliers. Additional conditions may apply and will be discussed with and disclosed to suppliers prior to contract engagements.
- In addition to the legal standards mentioned in this Code of Conduct, suppliers will comply with all other applicable laws in the provision of products or services to Arcadis in line with our business principles.
- Arcadis expects suppliers to implement systems and controls to promote compliance with applicable laws and the principles set forth in this Code of Conduct, including supplier risk assessments, training, policies, training by Arcadis, monitoring and on or off-site auditing mechanisms with corrective action plans for non-compliance. Suppliers should also apply these or similar principles to the subcontractors and suppliers they work with in providing goods and services to Arcadis.
- Arcadis reserves the right to assess and monitor supplier compliance with the Code of Conduct and you should be prepared to report to us on related matters, as required, especially as sustainability becomes further embedded in to our day to day operations and as new laws and legislation become live.
- Suppliers who are not in compliance with the Code of Conduct or our general business principles are expected to implement corrective actions or they may not be considered for future business.
- Violation of the Code of Conduct or our general business principles may lead to sanctions, up to and including discharge or termination in line with supplier contracts.

3. Our commitments to you

We follow a fair process to select and award business to suppliers

- Arcadis supports the principle of fair competition as a basis for selecting suppliers and awarding business to suppliers in line with our UK Procurement Policy.
- Whilst considering the advantages to Arcadis of maintaining a continuing relationship with a supplier, we will avoid any arrangement that could, in the long term, prevent fair competition and expect our suppliers to work with us in keeping our approach fair.
- Arcadis teams are expected to fully comply with the internal procurement and sourcing process followed by purchase requests and purchase orders when awarding business to a supplier and the associated due diligence required to set a supplier up on our systems. Any supplier not willing to work in accordance with these procedures will be excluded from qualifying for work.
- For project-related work on behalf of clients, Arcadis will aim to provide a purchase order for all applicable purchases.

We pay suppliers in line with Arcadis rules

- Our internal rules at Arcadis mean that in the UK it is our intention to pay in an appropriate timescale or in line with supplier contracts.
- Please note that any payment for your services or products must be made to a company, not to an individual.
- Cash payments are not permitted; all payments should be made to a bank account designated in writing in the name of the supplier of goods or services.
- Payments to numbered bank accounts are not permitted.

We select suppliers that comply with high ethical standards

- Arcadis prefers to select suppliers and award business to suppliers and subcontractors that are committed to act fairly and with integrity towards their stakeholders and that duly observe the applicable rules of the law of the countries they operate in and internationally accepted human and labor rights.
- We also seek suppliers that have a work philosophy that is aligned with Arcadis passion to create a higher quality of life in the communities in which they operate.

4. Reporting Violations of the Code of Conduct

- Arcadis encourages its suppliers to report any suspected violations of our core values, this Code of Conduct or other laws and regulations through the normal reporting procedures. This means that suppliers are encouraged to speak with their contact at the applicable Arcadis region.
- In case such reporting is not an option or the supplier does not feel comfortable with such reporting, the supplier may report a suspected violation higher up the issue reporting chain (e.g. to Arcadis regional management) who will then deal with that information appropriately and anonymously if required. If this is not possible, the supplier can contact procurement@arcadis.com.
- Reports concerning any violation of the Code of Conduct, or other laws, and concerns regarding questionable accounting or auditing matters should have sufficient detail of the suspected violations so that prompt investigation and, if necessary, corrective actions can be taken.
- No supplier will suffer because of reporting suspected violations of laws, regulations or company policies in good faith except for intentional self-reporting to avoid such consequences. Reports of suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.
- The management teams of Arcadis regions and countries are expected to monitor compliance with the general business principles, assist in the prompt investigation of any suspected violations, and report any breaches to the Executive Board and your Arcadis contact or Procurement team may be in touch from time to time in relation to this.

For more information please visit:
<https://www.arcadis.com/en/united-kingdom/who-we-are/business-practices/arcadis-general-business-principles/>

Approved by: 
Nilesh Parmar, Deputy Chief Executive Officer,
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