

Supplier Code of Conduct



May 2019



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Section 1: Introduction

For over 50 years of business, one thing has remained constant at Tetra Tech— our commitment to integrity and ethical business practices. Coffey Tetra Tech maintains business practice standards that command the respect of everyone with whom Coffey conducts business including our suppliers and subcontracting partners. These standards are intended to protect Coffey’s reputation and brand, the quality of its products and services, and the best interests of its clients, shareholders, and employees.

The standards of conduct that guide our worldwide business operations are set forth in our Corporate Code of Conduct (“Corporate Code”). Each of our employees is expected to comply with the Corporate Code and to work diligently in maintaining the highest standards of ethical conduct.

All persons, companies, partnerships and any third parties (including its employees, servants, agents and subcontractors) providing services to Coffey (collectively the “Suppliers”) are expected to share this commitment and are required to conduct themselves in accordance with this Supplier Code of Conduct (“Supplier Code”). We expect Suppliers to be familiar with our Supplier Code, to operate in accordance with the expectations outlined herein and to comply, at a minimum with all applicable laws, rules, regulations and standards within the geographies in which they operate.

Section 2: Expectations of Supplier Engagement

2.1 Supplier Engagement

Coffey International Development Limited, including its branches and subsidiaries, maintain relationships with Suppliers, relationships which are based on the recognition of the value of each party and the need to provide a working environment conducive to the success of our projects. We require all Suppliers to abide by the standards outlined in this Supplier Code.

2.2 Non-discrimination and Harassment

We are committed to equal opportunity for our employees and Suppliers and to creating, managing, and valuing diversity in our business practices. No Supplier shall engage in discrimination based on age, race, religion, ancestry, sex, gender identity, ethnic or national origin, marital status, disability, veteran status, sexual orientation, political affiliation, or genetics.

It is also Coffey’s policy to provide a workplace free of harassment which flows down throughout our supply chain. Suppliers must not engage in, condone, or tolerate physical, verbal, mental or sexual harassment against or among their workers.

2.3 Health and Safety

Coffey's policy is to provide and maintain a workplace and all project sites free of safety and health hazards. The protection of Supplier employee health and the prevention of work-related injuries and illnesses are a vital and integral part of Company operations. Coffey has developed a comprehensive health and safety program to meet or exceed the applicable occupational health and safety requirements. Coffey will continuously monitor and improve operations, procedures, technologies, and programs that are conducive to maintaining a safe, secure, and healthy working environment.

All Suppliers must provide a safe and healthy working environment that complies with the applicable law, including any local laws and minimizes occupational hazards. If Suppliers provide residential facilities for their workers, they must be safe and sanitary. All Suppliers are responsible for upholding the health and safety standards established by Coffey. Specifically, each Suppliers' employee shall be responsible for the following:

- taking personal responsibility for his/her own health and safety, and for actions that affect others;
- integrating health and safety elements into all aspects of their work;
- abiding by established rules, regulations and safe work practices;
- adhering to all health and safety standards, and providing input on new hazards and continuous improvement measures;
- immediately reporting to a supervisor any unsafe act or condition that may exist in the workplace;
- immediately reporting injuries, illnesses, or other incidents where an undesired event results or could have resulted in harm to people, or loss/damage to property, production, or the environment;
- actively participating in Company-sponsored health and safety training as required for role or job function;
- using assigned personal protective equipment properly at all times;
- seeking to maintain good health to enable the safe performance of jobs, tasks, and responsibilities;
- arriving fit to perform jobs, tasks, and responsibilities in a safe, secure, productive, and effective manner during the entire duration of the work;
- refraining from behavior that could impair safety in the workplace;
- notifying his/her line manager, supervisor or HR Representative when he/she is not fit for work, or face situations or concerns that may adversely impact his/her ability to perform work safely; and
- refusing to work when faced with the possibility of serious injury or imminent danger of death.

Coffey's health and safety culture also extends to how we approach environmental sustainability. It is important that our Suppliers follow sustainable business practices that balance public wellbeing, economic, and environmental aspects of their businesses, as we do for our clients.

2.4 Duty of Care

Coffey have a Duty of Care (DoC) responsibility to our staff and partners who deploy under our projects. Coffey will provide the following as part of our internal DoC towards individuals deployed on Coffey business:

- Appropriate insurances, such as; public liability & professional indemnity; travel insurance & medical cover; repatriation & life insurance, and emergency medical assistance.
- Safe travel policies
- Risk assessments
- Travellers accountability and monitoring function
- Secure storage of traveller personal information, ensuring crisis response and management teams can access vital information in an emergency
- Access to medical and psychological assessment providers where required; and
- 24/7 access to Coffey Risk Management and Compliance (RM&C) team

We expect our partners and supply chain to be able to demonstrate that their travellers are fit to deploy and that they can manage DoC for their travellers. This is to be a commensurate level to the DoC that Coffey provide. Coffey will measure partners' capability to ensure that all aspects of DoC are covered and that they have adequate policies in place.

2.5 Controlled Substances and Intoxicants

The use, possession, manufacture, sale, or distribution of any controlled substance is prohibited on Company property or any of Supplier's owned, leased, or managed property, and all job sites. Suppliers are prohibited from providing any services to Coffey while under the influence of controlled substances or intoxicants. Controlled substances include alcohol, illegal drugs, or prescription drugs without a valid prescription.

2.6 Allegations of Unlawful Conduct

Any Supplier employee who is arrested or charged with illegal activity for any action that is related to his/her service to Coffey or involves the use of Company property must promptly report the incident to his/her point of contact at Coffey. As a standard practice, Coffey will notify the Supplier that the offending employee will be no longer be allowed to provide services to Coffey.

2.7 Confidential Information and Intellectual Property

Supplier employees may occasionally be exposed to Coffey's or our clients' confidential or proprietary information or intellectual property. Suppliers must maintain and protect the confidentiality of all confidential or proprietary information and use such information only as it is authorized and intended. No Supplier employees should access any confidential information without proper authority.

Confidential or proprietary information includes, but is not limited to:

- computer software, programming code, systems, network equipment configuration settings, databases, documentation and all data therein;
- financial data (including investments, profits, pricing, costs, and accounting);
- procurement plans, Supplier lists and purchase prices;
- technical information relating to products, processes, and techniques;
- client and supplier lists;
- marketing, advertising and sales programs and strategies;
- information relating to acquisition or divestiture activity;
- personal identifying information about personnel, as well as nonpublic recruiting and training materials;
- strategic business plans;
- systems, programs, and procedures; and
- non-public business secrets that might be of use to Coffey competitors, or harmful to Coffey or its clients, if disclosed.

2.8 Data Protection

The European General Data Protection Regulation (GDPR) came into force on 25 May 2018. The GDPR built on existing data protection requirements with the aim of enhancing our privacy and protecting us from the effects of data breaches in an increasingly data-driven world. We see it as a positive move as it gives individuals more control over who is holding and using their data. Coffey takes data security very seriously and we are confident that our existing systems and processes exceed current requirements.

Suppliers must adhere with its obligations set out in the GDPR and ensure that its employees also comply with the GDPR. Supplier must ensure that it has appropriate technical and organisational measures to protect against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data, appropriate to the harm that might result from the same. Suppliers must also ensure that access to personal data is limited to those employees who need access to personal data to meet the Supplier's obligations under the relevant project.

Suppliers and its employees will be required to adhere to Coffey's data protection policy and if you have any questions on GDPR, please contact our Data Processing and Compliance Manager at DPCM@coffey.com.

2.9 Media, Social Media and Public Relations

Media relations are the responsibility of Coffey's Communications department. All contacts with the media, including statements or responses, shall be handled through that department. If a Supplier is contacted by a member of the media or is asked for a statement regarding Coffey or any Company project, the Supplier should immediately direct the inquires to the Communications team at mary.vancura@tetrattech.com

Given the wide access to the internet and the accompanying proliferation of blogs, social media, chat rooms, and message boards, as well as the widespread use of mobile phones with video capability, the traditional definition of the media has broadened. Any inquiry from a blogger, writer, reporter, or social media community member irrespective of the medium, should be referred to the Communications Team. Suppliers should not publish or comment via social media in any way that suggests they are communicating on behalf of Coffey in any capacity.

2.10 Anti-Slavery and Human Trafficking

Coffey does not tolerate slavery, forced labor, or human trafficking in any form, in our supply chains or any part of our business. Suppliers shall comply with all applicable laws against forced labor, involuntary servitude, debt bondage, and trafficking in persons, including the U.K. Modern Slavery Act 2015. Suppliers will be required to adhere to Coffey's Whistleblowing policy and other additional policies and procedures in connection with goods and services pertaining to Coffey contracts with or for the U.K government.

2.11 Safeguarding

Coffey is committed to providing a safe and trusted environment which safeguards anyone who the organisation has contact with, including beneficiaries, staff and Suppliers. Coffey's organisational culture is one that prioritises safeguarding and ensures anyone who is a victim of an incident or reports an incident is safe and supported. In a case where it is proven that abuse or exploitation by a Supplier, working on behalf of Coffey has taken place, their employment or consultant agreement will be terminated with immediate effect.

2.12 Wage and Working Age Laws

Suppliers will comply with all local minimum working age laws and requirements and not utilise child labor. Suppliers must provide wages and benefits that meet or exceed local law requirements and are paid/provided in a timely manner.

2.13 Environmental Sustainability

Suppliers are expected to share Coffey's commitment to protecting and improving our environment with its projects around the world. At Coffey, we are committed to providing practical solutions to global problems using innovation in our projects, our operations, and our communities to help achieve a more sustainable world. Coffey's parent company, Tetra Tech are a participant member of the United Nations Global Compact — the world's largest corporate sustainability initiative — as part of its effort to continue to follow key environmental principles. Suppliers are encouraged to take steps to minimize their use of natural resources and any negative impact their operations have on the environment. Suppliers must operate in compliance with all applicable environmental laws. Coffey have joined the UN Global Compact Local Network UK in order to collaborate with other companies, share industry knowledge and help build better solutions and innovations to tackle and uphold universal principles, such as environmental laws, anti-corruption, labour and human rights.

Section 3: Business Conduct

3.1 Accurate Records and Reporting

Suppliers are required to record and report information accurately and honestly. Reporting, organising or destroying information to mislead or misinform is prohibited. No entry shall be made or purposely omitted on any records or data that intentionally hides or disguises the true nature of the transaction, project, plan, or other business information, nor shall any data regarding Company business or services be falsified or distorted in any way. Supplier employees are responsible for promptly reporting any concerns regarding records and reporting to their Coffey point-of-contact.

Suppliers must keep employee records in accordance with all applicable laws and regulations.

3.2 Quality

Coffey is dedicated to delivering high quality services to all its clients. We strive to deliver the highest quality services that exceed our clients' expectations. Suppliers must have the same commitment to quality in the work products and other services they provide.

3.3 Legal and Tax Compliance

Coffey complies with all laws and regulations that are applicable to its business both in the United Kingdom and in other countries in which it conducts business. Suppliers are not permitted to take any

action that would constitute a violation of law. Suppliers must be familiar with and comply with the laws and regulations that govern their areas of responsibility.

3.4 Anti- Bribery and Corruption Laws

Coffey maintains offices and conducts operations around the world. Many of the countries in which Coffey conducts business have laws and regulations that are significantly different than those in the United Kingdom. Suppliers outside the U.K. are responsible for knowing and complying with these laws. Suppliers must also take care to understand and respect the cultures and customs of the people with whom they work in these countries.

Coffey's good reputation in the global marketplace relies on its commitment to complying with laws that prohibit bribery and corruption in international transactions. In conducting international business, Suppliers must know and comply with United Kingdom and non-U.K. laws that apply to the project.

Suppliers must comply with the U.K. Bribery Act of 2010 (the "Bribery Act"). The Bribery Act makes it unlawful to, cover an offer promising or giving of an advantage, and requesting, agreeing to receive or accepting of an advantage. It also covers discrete offence of bribery of a foreign public official along with the offence of failure by a commercial organisation to prevent a bribe being paid to obtain or retain business or a business advantage. The Bribery Act has extra-territorial reach both for UK companies operating abroad and for overseas companies with a presence in the UK.

Suppliers must not engage in acts giving financial or other advantage to encourage that person to perform their functions or activities improperly or seek to influence a public official by bribery. Suppliers must take affirmative steps to prevent those doing business directly or indirectly before a government official on Coffey's behalf from engaging in bribery. Suppliers must promptly report any suspected violations to their Coffey primary point-of-contact.

3.5 Conflict of Interest

In connection with any actual or possible conflict of interest, where the circumstances are reasonably believed to create a risk that a decision may be unduly influenced by secondary interests, Suppliers must disclose the existence of the financial interest and disclose relevant details to their primary point-of-contact.

3.6 Money Laundering Prevention

Suppliers must comply with all applicable anti-money laundering and antiterrorism laws. Coffey only conducts business with reputable clients and suppliers involved in sound business activities with funds derived from legitimate sources.

3.7 Trade, Export, Import, and Sanctions Laws

Suppliers involved with international transactions are subject to a variety of laws and regulations of the United Kingdom and other countries, such as limits on some types of exports and imports, or restrictions on doing business with certain persons or entities. These rules prohibit certain transactions and/or impose licensing or reporting requirements. A violation of these laws could result in significant civil and/or criminal penalties. It is important for Suppliers to understand these restrictions.

U.K. and non-U.K. laws impose sanctions on business activities, including imports, exports, and financial transactions, with certain countries, entities, and other prohibited persons.

Section 4: U.K. and government business conduct

4.1 Special Nature of government Business

Coffey's clients include U.K. government, the European Commission, the United Nations and other International governments. Accordingly, it is necessary that all Suppliers comply with all statutes, regulations and rules that apply to these transactions. Where applicable, Suppliers will comply with all applicable principles and/or term and conditions.

4.2 Subcontracting

All Suppliers must comply with the terms and conditions of their subcontract, particularly in the areas of scope, key personnel, personnel qualification, deliverable products and testing. Coffey follows special procedures when purchasing materials and services from other companies for use in government contracts. Many government contract requirements must be passed down to Coffey's subcontractors and suppliers.

4.3 Gifts, Meals or Gratuities

Suppliers may not provide or pay for meals, refreshments, travel or lodging expenses, or give anything of value to Coffey consultants/employees, except as specifically permitted by the Project Manager/Director. Coffey and its employees must also comply with state, local, and foreign government rules governing the acceptance of business courtesies.

4.4 Kickbacks

The U.K. bribery Act forbids Coffey and its Suppliers from offering, soliciting, providing, or accepting any gift, money, or other item of value for improperly obtaining or rewarding favorable treatment in connection with contracts and subcontracts. The law also requires Coffey to report violations when there are reasonable grounds to believe that a violation exists.

Section 5: Reporting

5.1 Reporting Violations of the Code

Coffey expects each Supplier to promptly report to Coffey any violations of this Supplier Code. If a Supplier has reason to believe that such Supplier or any of its representatives, or an employee of Coffey or its representatives, may have violated this Supplier Code or any applicable law, rule or regulation, or otherwise engaged in unethical behavior, it is such Supplier's responsibility under this Supplier Code to promptly report the violation to such Supplier's primary Coffey contact. If for whatever reason this is not possible or appropriate, please contact any of the following:

- Coffey's Head of Compliance at complianceteam@coffey.com
- Coffey Tetra Tech's anonymous Ethics Hotline at **+1 800-886-2577**
- Online anonymously at tetratech.ethicspoint.com

5.2 Whistleblowing

Coffey is committed to creating a working environment that is active in respect of dealing with issues of malpractice. As such, Coffey ensures that every individual in the workplace has full protection from victimisation where they raise genuine concerns about malpractice, in accordance with The Public Interest Disclosure Act 1998.

5.3 U.K. Government Contract Reporting

A Supplier having knowledge of credible information concerning actual or potential violations of Coffey's policies as related to U.K. government contracting must report these concerns. Timeliness of reporting any suspected violation are important as Coffey has reporting obligations to the government. Coffey encourages Suppliers to report even potential issues, which shall be without fear of retaliation, and to relay this throughout the supply. Staff involved in DFID funded business, can immediately report all suspicions or allegations of aid diversion, fraud, money laundering or counter terrorism finance to the DFID Counter Fraud and Whistleblowing Unit (CFWU) at reportingconcerns@dfid.gov.uk or on +44(0)1355 843747.

5.4 False Reporting

Suppliers who file reports or provide evidence which they know to be false or without a reasonable belief in the truth and accuracy of such information will not be protected, and may be subject to termination of services. In addition, except to the extent required by law, Coffey does not intend this Code to protect Supplier employees who violate the confidentiality of any applicable lawyer-client privilege to which Coffey or its agents may be entitled under statute or common law principles, or to protect employees who violate their confidentiality obligations with regard to the

Company's trade secret information. Any Supplier employee who is considering the disclosure of information that may violate these privileges or reveal Company trade secrets is advised to seek legal advice before making such disclosure.