



TETRA TECH
International Development

Supplier Code of Conduct 2021



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Sign off Managing Director			

1. Introduction



Tetra Tech International Development Europe Limited, including its branches and subsidiaries (“**Tetra Tech**”, the “**Company**” or “**We**”) are committed to integrity and ethical business practices. We maintain business practice standards that command the respect of everyone with whom we conduct business including our suppliers and subcontracting associates. These standards are intended to protect Tetra Tech’s reputation and brand, the quality of our products and services, and the best interests of our clients, shareholders and personnel.

The standards of conduct that guide our worldwide business operations are set out in our Corporate Code of Conduct (“**Corporate Code**”). Each of our personnel 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 their personnel, servants, agents and subcontractors) providing services to Tetra Tech (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.

2. Expectations of Supplier Engagement



2.1. Supplier Engagement

Tetra Tech maintains relationships with Suppliers 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 ensuring that our personnel are safe, valued and are treated equally in their daily working life. We are proud to employ people from diverse communities, backgrounds and experiences. This diversity is essential to the inclusiveness of our workplace. We also believe this approach strengthens the quality of our work and the outcomes we deliver for clients, as well as poor and marginalised communities around the world.

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 our 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 and supply chains.

2.3. Health and Safety

Our policy is to provide and maintain a workplace and all project sites free of health and safety hazards. The protection of employee health, the prevention of work-related injuries and illnesses are therefore a vital and integral part of our operations. We have developed a comprehensive health and safety program to meet or exceed applicable occupational health and safety requirements. We 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 applicable law and minimises occupational hazards. If Suppliers provide residential facilities for their workers, these must be safe and sanitary. All Suppliers are responsible for upholding the health and safety standards established by Tetra Tech. Specifically, each Supplier’s 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;

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- adhering to all health and safety standards, and providing input on new hazards and continuous improvement measures;
- immediately reporting to a supervisor any unsafe acts or conditions that may exist in the workplace;
- immediately reporting injuries, illnesses, or other incidents where an undesired event results or could result 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 behaviour that could impair safety in the workplace;
- notifying their line manager, supervisor or HR Representative when they are 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.

Note: the above measures shall apply especially during the COVID-19 pandemic and Suppliers must take all reasonable measures to ensure a 'COVID-safe' working environment for their personnel and supply chains.

Tetra Tech'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

We have a Duty of Care (“**DoC**”) responsibility to our staff and associates who deploy under our projects. Tetra Tech will provide the following as part of our DoC towards individuals deployed by us on Tetra Tech 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;
- traveller 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 the Tetra Tech Risk and Compliance team.

We expect our Suppliers to be able to demonstrate that their travellers are fit to deploy and that they can manage DoC for their own travellers. This is to be a commensurate level to the DoC that Tetra Tech provides (above). We measure Supplier 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 a Supplier's owned, leased, or managed property, and all job sites. Suppliers and their personnel are prohibited from providing any services to Tetra Tech 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 personnel who is arrested or charged with illegal activity for any action that is related to their service to Tetra Tech or involves the use of Company property must promptly report the incident to their point of contact at Tetra Tech. We reserve the right to notify the Supplier that the offending employee will no longer be allowed to provide services to Tetra Tech.

2.7. Confidential Information and Intellectual Property

Supplier personnel may occasionally have access to Tetra Tech'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 authorised and intended. No Supplier personnel should access any confidential information without proper prior authority.

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

- computer software, programming code, IT systems, network equipment configuration settings, databases, documentation and all data therein;
- financial data;
- 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 non-public recruiting and training materials;
- strategic business plans;
- systems, policies and procedures; and
- non-public business secrets that might be of use to Tetra Tech competitors, or harmful to us or our clients, if disclosed.

2.8. Data Protection

The European General Data Protection Regulation (GDPR) came into force on 25 May 2018¹. 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.

Suppliers must adhere with their obligations set out in the GDPR and ensure that their personnel also comply with the GDPR. Each 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 personnel who need access to personal data to meet the Supplier's obligations under the relevant project.

Suppliers and their personnel will be required to adhere to our data protection policy. If you have any questions on GDPR, please contact our Data Protection and Compliance Manager at DPCM@tetrattech.com.

2.9. Media, Social Media, and Public Relations

Media relations are the responsibility of our Communications department. All contacts with the media, including statements or responses, shall be handled through this department. If a Supplier is contacted by a member of the media or is asked for a statement regarding Tetra Tech 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 Tetra Tech in any capacity.

2.10. Modern-Slavery and Human Trafficking

We do not tolerate slavery, forced labour 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 labour, involuntary servitude, debt bondage, and trafficking in persons, including the UK Modern Slavery Act 2015.

2.11. Safeguarding

We are committed to providing a safe and trusted environment which safeguards anyone who the organisation has contact with, including beneficiaries, staff and Suppliers. Our 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 any case where it is

¹ Any references in this document to GDPR shall include the UK's retained EU law version of GDPR further to the UK's withdrawal from the European Union (UK GDPR).

proven that abuse or exploitation by a Supplier has taken place, we reserve the right to require that their employment or consultant agreement will be terminated with immediate effect. All incidents must be reported to cuereporting@tetratech.com.

2.12. Wage and Working Age Laws

Suppliers must comply with all local minimum working age laws and requirements and not utilise child labour. Any individual under the age of 18 is considered a child according to UK law. 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 our commitment to protecting and improving our environment with projects around the world. We are committed to providing practical solutions to global problems using innovation in our projects, operations and communities to help achieve a more sustainable world. Tetra Tech's parent company, Tetra Tech, Inc. is a participant member of the United Nations Global Compact — the world's largest corporate sustainability initiative — as part of efforts to continue to follow key environmental principles. Suppliers are encouraged to take steps to minimise 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. We 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.

2.14. Tetra Tech policies

Unless it already has suitable policies and procedures in place, a Supplier will be required to adhere to the Company's policies and procedures in connection with the provision of any goods and services on Company projects².

3. Business Conduct



3.1. Accurate Records and Reporting

Suppliers are required to record and report information accurately and honestly. Misreporting, disorganising or destroying information with the intent 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. Suppliers and their personnel are responsible for promptly reporting any concerns regarding records and reporting in accordance with our whistleblowing policy (see above).

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

3.2. Quality

We are dedicated to delivering high quality services to all our 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

We comply with all laws and regulations applicable to our business both in the United Kingdom and in other countries in which we conduct business. Suppliers are not permitted to take any action that would constitute a violation of the 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

² <https://intdev.tetratecheurope.com/responsible-business-practices-3-2/>

We maintain offices and conduct operations around the world. Many of the countries in which we conduct 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 laws referenced in their contracts. Suppliers must also take care to understand and respect the cultures and customs of the people with whom they work in these countries but, at all times, recognising the overriding duty to comply with the law.

Tetra Tech's good reputation in the global marketplace relies on our 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 their project.

Suppliers must comply with the U.K. [Bribery Act of 2010](#) (the "**Bribery Act**"). The Bribery Act makes it unlawful to offer/promise/give or receive/request/accept a financial or other advantage for the improper performance of a relevant function or activity. It also covers the discrete offence of *bribery of a foreign public official* along with the offence of *failure by a commercial organisation to prevent* bribery. The Bribery Act has extra-territorial reach both for UK companies operating abroad and for overseas companies with a presence in the UK. Any breaches by Suppliers may lead to liability for Tetra Tech and therefore ethical compliance is of paramount importance.

Suppliers must take affirmative steps to prevent its personnel and supply chains from engaging in bribery. Suppliers must promptly report any suspected violations in accordance with Tetra Tech's whistleblowing policy.

3.5. Conflict of Interest

Suppliers must always seek to avoid conflicts of interest during their dealings with Tetra Tech and on our projects.

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 or other 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 anti-terrorism laws. We only conduct 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.

4. U.K and government business conduct



4.1. Special Nature of government Business

Our clients include U.K. government, the European Commission, World Bank, United Nations and other International organisations and governments. Accordingly, it is necessary that all Suppliers comply with all statutes, regulations and rules that apply to tenders and projects financed by these clients, including any client terms and conditions and codes of conduct.

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, reporting and deliverables. Tetra Tech may follow special procedures when purchasing materials and services from other companies for use in government contracts. Some government contract requirements must be contractually passed down to our suppliers and are outlined in the terms and conditions.

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 Tetra Tech associates/personnel, except in accordance with Company policy. Tetra Tech and those working on our behalf must also comply with national and foreign government rules governing the giving and acceptance of business courtesies.

4.4. Kickbacks

The U.K. Bribery Act (above) forbids Tetra Tech and our Suppliers from offering, soliciting, providing, or accepting any gifts, money, or other items of value for improperly obtaining or rewarding favourable treatment, in connection with contracts and subcontracts. Certain laws may also require Tetra Tech to report violations when there are reasonable grounds to believe that a violation exists.

5. Reporting



5.1. Reporting Violations of the Code

We expect each Supplier to promptly report any violations of this Supplier Code to us.

If a Supplier has reason to believe that such Supplier or an employee of Tetra Tech or our representatives, may have violated this Supplier Code or any applicable law, rule or regulation, or otherwise engaged in unethical behaviour, it is such Supplier's responsibility under this Supplier Code to promptly report the violation in accordance with our Whistleblowing policy:

- Tetra Tech's Legal and Compliance teams at cuereporting@tetratech.com
- Tetra Tech's anonymous Ethics Hotline at +1 800-886-2577
- Online anonymously at tetratech.ethicspoint.com

5.2. Whistleblowing

We are committed to creating a working environment that is active in respect of dealing with issues of malpractice. As such, Tetra Tech ensures that every relevant 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.

Suppliers who file reports or provide evidence in bad faith, 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, Tetra Tech does not intend this Supplier Code to protect (a) Supplier personnel who violate the confidentiality of any applicable lawyer-client privilege to which Tetra Tech or our agents may be entitled under statute or common law principles, or (b) Supplier personnel who violate their confidentiality obligations with regard to the Company's trade secrets and confidential information. Any Supplier personnel 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.

5.3. U.K. Government Contract Reporting

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