

## NIRAS Compliance Unit

NIRAS' Compliance Unit (NCU) is an independent corporate unit, established to combat corruption in all its forms. NCU is servicing the entire NIRAS Group and refers directly to the company's CEO and to the Chairperson of the NIRAS Board of Directors, depending on the actual case in question. The Compliance Unit is responsible for anti-corruption measures including training, handling of corruption cases and for NIRAS' whistleblower arrangement that concerns corruption. NIRAS' HR Department is responsible for handling whistleblower cases that concern harassment, bullying and discrimination.

'Corruption' is a general term of misconduct which NIRAS defines broadly.

We distinguish between seven types of corruption:

NIRAS will always consider the first two types of corruption mentioned below as illegal:

1. Bribery & Facilitation payment
2. Fraud & Embezzlement

The following five types of behaviour represent situations that have a potential for becoming corruption. However, if we tackle each situation properly, it is not corruption but instead an example of a difficult situation handled with the right precautions.

3. Extortion & Security payment
4. Gifts & Entertainment
5. Conflicts of Interest
6. Nepotism & Favouritism
7. Obtaining Undue Advantages

**NIRAS has zero-tolerance for corruption.**

NIRAS relies on all employees, including management, to play key roles in ensuring NIRAS' integrity, internally in our relations with other NIRAS staffs as well as externally in dealing with clients and partners. We must act in accordance with NIRAS' Code of Conduct, and fully understand the importance of complying with ethical behaviour as described in NIRAS Business Integrity and Ethics Policy.

You can report corruption and suspicion of corruption to your immediate manager or to a trusted NIRAS staff member, or you can use NIRAS Internal [Whistleblower Arrangement](#) which is being managed by the NCU. In any case, the recipient of your reporting is obliged immediately to report it further on to either the NCU or directly to NIRAS' CEO or to the Chairperson of the NIRAS Board of Directors.