

BIRRING & BAGRI LTD

ETHICS, INTEGRITY & PROFESSIONAL CONDUCT STATEMENT

Effective: September 2026 | Last reviewed: September 2026 | Next review: September 2027

1. Our Commitment

Birring & Bagri Ltd is committed to conducting its business with integrity, professionalism, independence, fairness and respect.

This Statement sets out the standards we expect to apply in our professional relationships, decision-making and business conduct. It reflects our commitment to responsible consultancy and to maintaining the confidence of clients, partners, suppliers, public bodies and other stakeholders.

We recognise that trust is earned through conduct. Commercial opportunity will not take precedence over lawful, ethical and professionally responsible behaviour.

2. Scope

This Statement applies to Birring & Bagri's business activities and is intended to guide directors, employees, consultants, associates and others acting for or representing the company, where relevant to their role.

We also expect suppliers, contractors and business partners to conduct themselves consistently with applicable law and with appropriate standards of integrity when working with us.

3. Integrity and Professional Standards

We seek to act honestly, responsibly and in good faith, and to provide professional services with appropriate care, competence and diligence.

Our professional conduct is guided by the following principles:

- acting lawfully and ethically;
- being accurate and candid in material professional communications;
- avoiding deliberate misrepresentation or concealment of material facts;
- maintaining appropriate professional judgement and challenge;
- respecting confidentiality, privacy and intellectual property;
- treating clients, counterparties and stakeholders fairly and respectfully; and
- taking responsibility for our work and correcting material errors where appropriate.

4. Independence and Objective Judgement

Birring & Bagri values independent professional judgement.

We seek to provide advice and recommendations based on the relevant evidence, professional assessment and the legitimate objectives of the engagement, rather than improper influence or undisclosed personal interests.

We will not knowingly allow a commercial relationship, inducement or external pressure to compromise our professional integrity.

5. Conflicts of Interest

We recognise that actual, potential or perceived conflicts of interest can undermine confidence in professional advice and decision-making.

Where a material conflict is identified, we will seek to assess it promptly and determine an appropriate response. This may include disclosure, information barriers, additional oversight, obtaining informed agreement where appropriate, declining particular work or withdrawing from an engagement.

We expect individuals acting for Birring & Bagri to disclose relevant interests or relationships that could reasonably call their objectivity into question.

Confidential information obtained through one engagement will not be used improperly for the benefit of another client or party.

6. Anti-Bribery and Corruption

Birring & Bagri has zero tolerance for bribery and corruption.

We will not offer, promise, give, request, agree to receive or accept a financial or other advantage where doing so would constitute bribery or otherwise be intended to induce improper performance.

This applies to dealings in both the public and private sectors and to conduct undertaken directly or through agents, intermediaries, consultants or other third parties.

We do not permit facilitation payments. Any demand for an improper payment or advantage should be refused and raised through an appropriate internal or external route.

7. Gifts, Hospitality and Business Courtesies

Reasonable and proportionate business hospitality can support legitimate professional relationships. It must never be used to improperly influence a decision or create an inappropriate obligation.

Gifts, hospitality or other benefits should not be offered or accepted where they are excessive, secretive, frequent, connected to an active competitive or procurement decision in a manner that could compromise integrity, or otherwise capable of creating a reasonable perception of improper influence.

Where appropriate, gifts and hospitality may be declined, disclosed or recorded.

8. Procurement, Commercial Dealings and Fair Competition

Given Birring & Bagri's work in procurement, commercial advisory and strategic consultancy, we place particular importance on integrity in purchasing and competitive processes.

We seek to support fair and transparent competition, proportionate decision-making, appropriate management of conflicts, responsible use of information and defensible commercial outcomes.

We will not knowingly participate in bid-rigging, collusion, market manipulation, improper sharing of competitively sensitive information or other anti-competitive conduct.

Where we advise a client on procurement or commercial decisions, we will seek to distinguish the client's interests and decision-making responsibilities from Birring & Bagri's own commercial interests.

9. Confidentiality and Information Handling

Information entrusted to Birring & Bagri may be commercially sensitive, confidential, personal, privileged or otherwise restricted.

We seek to use such information only for legitimate and authorised purposes and to protect it from inappropriate disclosure or misuse.

Confidentiality obligations may continue after an engagement or business relationship has ended.

Our approach to personal information and responsible technology use is further addressed in our Privacy Notice and Responsible Artificial Intelligence (AI) Statement.

10. Accuracy, Evidence and Professional Communications

We seek to ensure that material claims, advice, reports and representations are appropriately supported and are not knowingly false or misleading.

Where information is uncertain, incomplete, dependent on assumptions or subject to material limitations, we will seek to communicate that appropriately.

We will not knowingly fabricate qualifications, experience, evidence, endorsements, client relationships, research findings or professional achievements.

11. Public Policy, Government and Stakeholder Engagement

Where Birring & Bagri undertakes public policy, government relations, stakeholder engagement or international advisory work, we seek to conduct that activity transparently, lawfully and professionally.

We will not knowingly misrepresent who we represent, the purpose of an engagement or material interests relevant to our participation.

Where registration, disclosure or other legal requirements apply to lobbying, political engagement or related activities, we will seek to comply with those requirements.

Birring & Bagri does not regard access to public officials or decision-makers as a commodity that can be improperly bought, sold or traded.

12. Financial Crime and Improper Business

Birring & Bagri will not knowingly facilitate fraud, money laundering, tax evasion, sanctions evasion or other financial crime.

Where the nature of an engagement, counterparty or transaction presents elevated risk, we may undertake proportionate checks and may decline or discontinue work where concerns cannot be satisfactorily resolved.

We reserve the right to comply with lawful reporting, disclosure or cooperation obligations where applicable.

13. Equality, Respect and Professional Behaviour

We expect professional relationships to be conducted with dignity and respect.

Discrimination, harassment, bullying, intimidation, victimisation and abusive conduct are inconsistent with the standards Birring & Bagri seeks to maintain.

We value constructive challenge and differing professional perspectives, but expect disagreement to be expressed appropriately and without compromising respect or integrity.

14. Responsible Use of Artificial Intelligence and Technology

Technology, including artificial intelligence, may support Birring & Bagri's professional work but does not remove human accountability.

We expect technology to be used lawfully, securely and proportionately, with appropriate consideration of confidentiality, accuracy, bias, intellectual property and professional judgement.

Further information is provided in our Responsible Artificial Intelligence (AI) Statement and Intellectual Property & Brand Statement.

15. Speaking Up and Raising Concerns

We encourage genuine concerns about suspected unethical, unlawful or improper conduct connected with Birring & Bagri to be raised promptly.

Concerns will be considered proportionately and in good faith. We do not support retaliation against a person for raising a genuine concern responsibly.

Nothing in this Statement is intended to prevent lawful reporting to regulators, law-enforcement bodies, professional advisers or other competent authorities, or to restrict any legally protected disclosure.

16. Suppliers, Consultants and Business Partners

We expect those acting for or on behalf of Birring & Bagri to avoid conduct that would undermine the standards set out in this Statement.

Where proportionate, contractual arrangements may address matters such as anti-bribery, confidentiality, conflicts, data protection, intellectual property, modern slavery, sanctions or other compliance requirements.

Serious or repeated ethical concerns may lead us to reconsider or terminate a business relationship where lawful and appropriate.

17. Breaches and Response

Suspected breaches will be considered according to their nature, seriousness and available evidence.

Where appropriate, action may include investigation, corrective measures, additional controls, removal from an assignment, termination of a supplier or contractual relationship, or referral to relevant authorities.

Our response will be proportionate and will take account of applicable contractual and legal obligations.

18. Review and Continuous Improvement

Birring & Bagri will keep this Statement and its supporting governance arrangements under review as the business develops.

We may strengthen or update our controls in response to changes in law, regulation, professional expectations, business activities, markets or identified risks.

Effective date: September 2026

Next scheduled review: September 2027

19. Contact

Questions or concerns relating to ethics, integrity or professional conduct may be directed to:

Birring & Bagri Ltd

Website: www.birringandbagri.com

Email: info@birringandbagri.com

Birring & Bagri Ltd

Website: www.birringandbagri.com

General enquiries: info@birringandbagri.com