

Anti-Corruption and Bribery including Gifts and Gratuities Policy

The Company is committed to applying the highest standards of ethical conduct and integrity in its business activities in the UK and overseas. Every employee and individual acting on the Company's behalf is responsible for maintaining the Company's reputation and for conducting Company business honestly and professionally.

The Company considers that bribery and corruption has a detrimental impact on business by undermining good governance and distorting free markets.

The Company benefits from carrying out business in a transparent and ethical way and helping to ensure that there is honest, open and fair competition in architectural design. Where there is a level playing field, the Company can lead the market through innovative design by professionals with vision and a wealth of international experience.

Transparent, fair conduct helps to foster deeper relationships of trust between the Company and its business partners and customers. It is vital for the Company's reputation and future growth.

The Company does not tolerate any form of bribery, whether direct or indirect, by, or of, its employees, officers, agents or consultants or any persons or companies acting for it or on its behalf. The board and senior management are committed to implementing and enforcing effective systems throughout the Company to prevent, monitor and eliminate bribery, in accordance with the Bribery Act 2010.

All employees and other individuals acting for the Company are required to familiarise themselves and comply with the Company's anti-bribery procedure as detailed under this section with immediate effect.

Potential Risks

The Company has identified that the following potential scenarios are particular risks for its business:

- (a) it becomes apparent that a third party engages in, or has been accused of engaging in, improper business practices;
- (b) it becomes apparent that a third party has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a "special relationship" with foreign government officials;
- (c) a third party insists on receiving a commission or fee payment before committing to sign up to a contract with the Company, or carrying out a government function or process for the Company;
- (d) a third party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made;
- (e) a third party requests that payment is made to a country or geographic location different from where the third party resides or conducts business;
- (f) a third party requests an unexpected additional fee or commission to "facilitate" a service;
- (g) a third party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services;
- (h) a third party requests that a payment is made to "overlook" potential legal violations;
- (i) a third party requests that the Company provides employment or some other advantage to a friend or relative;
- (j) an invoice is received from a third party that appears to be non-standard or customised;

- (k) a third party insists on the use of side letters or refuses to put terms agreed in writing;
- (l) the Company has been invoiced for a commission or fee payment that appears large given the service stated to have been provided.

The list is not intended to be exhaustive and is for illustrative purposes only.

Employees and others acting for or on behalf of the Company are strictly prohibited from making, soliciting or receiving any bribes or unauthorised payments.

As part of its anti-bribery measures, the Company is committed to transparent, proportionate, reasonable and bona fide hospitality and promotional expenditure. Such expenditure must be authorised in advance.

A breach of the Company's anti-bribery policy by an employee will be treated as grounds for disciplinary action, which may result in a finding of gross misconduct, and immediate dismissal. Employees and other individuals acting for the Company should note that bribery is a criminal offence that may result in up to 10 years' imprisonment and/or an unlimited fine for the individual and an unlimited fine for the Company.

The Company will not conduct business with service providers, agents or representatives that do not support the Company's anti-bribery objectives. The Company reserves the right to terminate its contractual arrangements with any third parties acting for, or on behalf of, the Company with immediate effect where there is evidence that they have committed acts of bribery.

The success of the Company's anti-bribery measures depends on all employees, and those acting for the Company, playing their part in helping to detect and eradicate bribery. Therefore, all employees and others acting for, or on behalf of, the Company are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If they are unsure whether a particular act constitutes bribery or corruption, or if they have any other queries, these should be raised with a Director. Employees can also report any concerns by following the procedure set out in the Company's Whistleblowing Policy details of which are set out in the company Handbook. The Company will support any individuals who make such a report, provided that it is made in good faith.

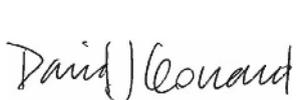
The courts have established that all gifts and benefits received from third parties as a result of employment are the property of the employer.

In the case where gifts and benefits are offered to or given to an employee the employee is required to inform or pass them onto the Director immediately. The Company will then determine whether or not the gift or benefit can be accepted or the most appropriate method of apportioning it amongst the employees.

Employees should not accept cash, a cash equivalent, such as gift vouchers or other

benefits from third parties as a result of placing orders with third parties on behalf of the Company. Such activity is a disciplinary matter and may result in dismissal.

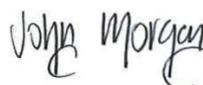
Signed by the Directors



David Leonard



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John Morgan



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