

# Ethics

## Purpose

This policy sets out our commitment to maintaining the highest ethical standards in the conduct of our business.

## Commitment

The Company is committed to promoting the highest standards of ethical behaviour in all that we do. This is reflected in our IRTTE values of Integrity, Responsibility, Transparency, Trust and Excellence.

We are committed to providing a working environment underpinned by our values, where everyone who works for or with us respects the values we live by.

We support the proactive position our clients take on assignment delivery with good business ethics.

We are prohibited from offering, giving, soliciting or accepting any bribe (cash or other inducement) or facilitation payment, or from engaging in any corrupt practice.

We work to continually improve our anti-bribery systems and practices.

We prohibit the payment of donations to political parties or charities to obtain a business advantage.

We obey the law and respect the customs and culture of the countries in which we work and comply with national and international trade restrictions.

We compete fairly, respecting the laws and ethical practices of the jurisdictions in which we work.

Adhering to this policy is a condition of employment and breaches will result in disciplinary action.

We are committed to achieving these standards within our supply chain and working with partners and clients who share our ethical standards.

## Responsibility

The Managing Partner is responsible for this policy and for its effective implementation.

Project managers are responsible for assessing and treating the ethics risks within their projects.

All of us are responsible for meeting our ethical standards and for promoting our IRTTE values.

## Approach

Our relationships with suppliers, subcontractors, experts and other business partners are based on mutual respect and good governance.

We monitor the conduct of independent experts to ensure compliance with our policies. Experts' remuneration is always appropriate for the work they do and is justifiable at market value.

We all receive training on the Expert's ethics policies and processes as part of induction and throughout our employment.

While business entertainment and gifts can generate goodwill and improve working relationships, we avoid situations that could interfere, or appear to interfere, with the impartial discharge of the Expert's duties. We take great care when considering providing gifts or hospitality to government officials to ensure we do not breach their working regulations.

We identify and manage actual and suspected conflicts of interest as soon as they arise.

We encourage colleagues to seek help and advice from line management if they suspect our ethical standards are being breached and provide confidential resources to report concerns when violations occur.

We are committed to making our communications, marketing and publications factually correct, ethical and fair. We compete vigorously but do not seek to misrepresent our competitors.



**Gagik Grigoryan**  
Managing Partner