

Anti-Corruption Policy

Conflict of Interest

HKS has earned its reputation for integrity by consistently doing business with the highest ethical standards. We expect the same from our employees and from those who do business with us around the world. Integrity should be at the heart of every business negotiation, every client relationship, and every employee encounter.

A conflict of interest arises when employees acting on behalf of the firm obtain improper personal gain for themselves or for another party, or when a particular action by an employee has an adverse effect on the firm's interests. If anyone should find themselves in a situation that may involve a conflict of interest, or the appearance of a conflict of interest, they should notify their manager or Corporate Officer. The matter may also be referred to Human Resources Leadership for interpretation and guidance.

Anti-Corruption

HKS is committed to conducting business fairly, honorably, with integrity, and in compliance with all applicable U.S. and foreign anti-corruption laws. Bribes and corrupt payments are strictly prohibited.

The requirements of this Anti-Corruption Policy apply to all full-time, temporary, and part-time officers, directors, employees, contract workers, and independent consultants of HKS, and personnel doing business on behalf of or for purposes of HKS ("HKS Persons").



Robin Craig Williams, FAIA, RIBA
Chief Legal Officer
December 2023

HKS and HKS Persons must act ethically and abide by the anti-corruption laws in the United States and applicable foreign jurisdictions. A fundamental aspect of HKS's commitment to good corporate citizenship is to comply with all laws, including those that prohibit corrupt activities. Accordingly, this Policy provides mandatory guidelines that govern all expenditures made by HKS in dealings with all government officials.

HKS and HKS Persons are prohibited from, directly or indirectly, offering to pay, paying, promising to pay, or authorizing the payment of money or anything of value to a government official in order to influence any act or decision of the government official in his or her official capacity or to secure any other improper advantage in order to obtain or retain business. A "government official" for the purposes of this Policy means any foreign or domestic person who is: (i) an officer or employee of a government or a governmental department, agency or instrumentality; (ii) a political party, a party official, or candidate for political office; (iii) an officer or employee of a government-owned or controlled entity or company; (iv) a member of the military; (v) an officer or employee of a public international organization (such as the United Nations or the World Bank); or (vi) any person acting in an official capacity for or on behalf of any of the foregoing.

For purposes of this Policy, whether the recipient of any bribe or corrupt payment works in the public or private sector is irrelevant. This means that no HKS Person or third party acting on HKS's behalf may authorize, pay, promise, or offer to give anything of value to any person, entity, customer, vendor, government official, government agency, or political party in order to influence improperly such individual, entity, or government official to act favorably towards HKS.

Anti-Corruption Policy (continued)

No bribes, kickbacks, or other improper payments or benefits can be given or offered, directly or indirectly, by or on behalf of HKS, under any circumstances. Of course, a payment made under the threat of imminent physical harm would not constitute an improper payment (although a payment made under such circumstances should still be reported).

All third parties, including agents, consultants, business partners, subsidiaries, sub-contractors, vendors, affiliates, and any other individuals or entities doing business on behalf of HKS, must conduct themselves in accordance with this Policy. All personnel are required to ensure that HKS only deals with legitimate, reputable and qualified third parties. HKS Persons must ensure that Representatives understand and comply with their obligations not to engage in improper conduct in connection with the business they conduct for HKS. Accordingly, each Representative must be carefully evaluated before being retained by HKS.

HKS Persons must obtain prior written approval from [Legal] before retaining any third party to assist HKS in business that requires or involves interaction with a government official. Prior to retaining or entering into a contract with a third party that may interact with a government official, HKS will conduct due diligence proportionate to the risks involved in retaining the third party.

In many countries, public officials are prohibited from receiving gifts from any individual or entity whose professional, commercial, or industrial activities are directly linked, regulated, or supervised by the relevant public official.



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Under no circumstances shall political donations or sponsorships be made to improperly influence government officials to act in favor of HKS. This applies regardless of whether it is a charity of a government agency or one chosen by a government official.

HKS does not contribute to political parties or organizations, or to any individual who holds or is candidate for public office. HKS Persons may not make political contributions on HKS's behalf.

HKS persons should report any violation or suspected irregularities of these principles or the Anti-Corruption Policy to your Corporate Officer or Human Resources leadership. In addition, you could report the incident anonymously through the Ethics Hotline of your country of residence. Failure to report such information may be grounds for disciplinary action of the non-reporting HKS Person, up to and including termination. No person who reports such a potential violation will be retaliated against due to such report.

Whistleblower Policy

Because HKS is committed to investigating and remedying any conduct or behavior that may be a violation of the Company's Code of Ethics and other Employment Policies and Practices, all HKS employees have a duty to report such conduct or behavior to a supervisor, a member of the HKS's Executive Committee, the Chief Compliance Officer or by using the HKS Ethics Hotline. If an employee chooses to report conduct potentially violating the Company's Code to a member of Congress, an authorized official of a contracting agency or the Department of Justice, HKS commits to a policy that that employee will not be discharged, demoted or otherwise discriminated against by the Company or any of its employees.