

OPEN INFORMATION POLICY

NIRAS-LTS International (hereafter NIRAS-LTS) understands the importance of openness and transparency in the delivery of our consultancy and project management services. We demonstrate these values through the sharing of clear, timely and relevant information about our activities and responding to requests for it. We have a comprehensive website of our project experience and are committed to providing quick and accurate responses to external clients and stakeholders.

When asked for information we will need to take into consideration the nature of the information requested, and the amount of time and financial resources required to fulfil the request. Consequently, it may not be deemed feasible to fulfil the request (e.g. if an extraordinary amount of detail, or if the information requested falls within the list of exclusions below).

This policy will be reviewed bi-annually and, where necessary, updated.

1 Responsibility

The individual(s) responsible for implementation of this policy will reflect the nature of the information request. Appointment of the suitable individual(s) will be made by the Managing Director.

NIRAS-LTS acknowledges its responsibility for quality assurance i.e. the accuracy and completeness, as well as quality, of our data. NIRAS-LTS has ISO 9001:2015 quality certification for the provision of project management and consultancy services. We will also welcome any independent monitoring of our projects that may be commissioned by our clients.

2 Scope

This policy applies to the activities of NIRAS-LTS (registered in Scotland). Our sub-contractors engaged on project work agree to abide by this policy through their contract with NIRAS-LTS.

3 Principles

We publish detailed information on our website, including overviews of our history, values, policies, clients, projects, expertise, staff, publications, news and contact information. Our annual accounts are published on the Companies House website along with information on our Directors and shareholders.

3.1 Exclusions

In relation to projects spending ODA, the following exclusions policy for NIRAS-LTS will be applied:

- **International Relations:** Information that may damage the interests of the United Kingdom or harm the client's relations with other governments or institutions.
- **Security and Safety:** Information that may pose a risk to the security or safety of any individual, including the client's staff, NIRAS-LTS staff and sub-contractors, and beneficiaries. This includes circumstances of volatility from a security or political economy perspective and for this reason the identities of NIRAS-LTS suppliers based in fragile states will be redacted from disclosure documents.
- **Personal information:** Information which if disclosed would constitute breach of the Data Protection Act, the General Data Protection Regulation, or other applicable legislation and regulation in any jurisdiction.
- **Commercially Sensitive Information:** Information which if disclosed could harm the client's or the client's partners' or NIRAS-LTS's commercial interests or which is otherwise disclosed to NIRAS-LTS in confidence or under similar

restrictions. This includes but is not limited to trade secrets and information concerning specific daily or hourly fee rates.

- **Scale:** *De minimis* arrangements will operate under which information relating to projects of less than £100,000 in value will not normally be disclosed. Data will also not normally be disclosed on individual NIRAS-LTS suppliers if they are sole traders or small enterprises with less than five employees and/or in circumstances where they may be unable to access regular internet at sufficient speed to upload data. NIRAS-LTS will, however, provide aggregated data in relation to sole traders and small enterprises and there may be circumstances in which NIRAS-LTS decide that disclosure of data related to specific sole traders and small enterprises is justified by the scale of expenditure.
- **Information that is exempt from disclosure** under other policies or regulations including but not limited to the Freedom of Information Act 2000 and other applicable legislation in any jurisdiction.

4 Process

You should make your request in English to NIRAS-LTS either by phone on +44 (0)131 440 5500 between the hours of 09.00 and 17.00 Monday to Friday UK time, or via email to mail@ltsi.co.uk, or via post to NIRAS-LTS, Pentlands Science Park, Bush Loan, Penicuik EH26 0PL, Scotland, UK.

We will reply to requests within five working days, either with a positive response or with an explanation as to why the information requested cannot be provided. We reserve the right to ask the reason for the information request. The information will be provided within 30 working days from the date of the request.

5 The International Aid Transparency Initiative (IATI)

The International Aid Transparency Initiative (IATI) aims to make information about international aid spending easier to find, use and understand. It is a voluntary, multi-stakeholder initiative that unites NIRAS-LTS with donors. LTS' IATI Identifier number is GB-COH-SC100833 and a copy of this policy will be maintained on the IATI Registry.

Patrick Abbot

Managing Director, NIRAS-LTS International

5th November 2020