

ANTI-BRIBERY AND CORRUPTION POLICY

November 2024



Policy Statement

The Company policy is to conduct all our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.

The Company will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. We remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct in the UK.

The purpose of this policy is to:

- Set out our responsibilities, and of those working for us, in observing and upholding our position on bribery and corruption; and
- Provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues.

Legislation in the form of the Bribery Act 2010 means that bribery and corruption are currently punishable for individuals by up to ten years' imprisonment and if found to have taken part in corruption an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation. The Company therefore takes its legal responsibilities very seriously.

This Anti-Bribery and Corruption Policy should be read and applied in conjunction with the other policies adopted by the Company and incorporated within the Staff Handbook, particularly the Company Whistle Blowing Policy.

Scope

This policy applies to all employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, homeworkers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as workers in this policy).

In this policy, third party means any individual or organisation the Company may encounter during the course of its activities and includes actual and potential; clients, customers, suppliers, distributors, business contacts, agents, advisers, financiers, local and central government officials and public bodies, including their planning officers, building inspectors, representatives and other officials, politicians and political parties.

The Company zero-tolerance approach to bribery and corruption will be communicated to all workers, third parties and business partners at the outset of our business relationship with them and as appropriate thereafter.

What is Bribery?

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. A bribe may be an offer or promise in the future. Illustrations of an 'advantage' includes (but not limited to) money, gifts, loans, fees, hospitality, services, discounts and the award of a contract or anything else of value.

What is Corruption?

Corruption is the abuse of entrusted power or position for private gain. A bribe, advantage or corrupt activity, is not solely restricted to cash.

There are four types of offence set out in the Bribery Act 2010:

- Giving a bribe
- Receiving a bribe
- Bribing a foreign public official; and
- A corporate offence of failing to prevent bribery by an associated person for the organisations benefit.

Gifts and Hospitality

The Company recognises that market practice varies across the areas in which it does business and what is normal and acceptable in one place may not be in another. This policy statement prohibits any inducement which results in a personal gain or advantage to the recipient, or any person or body associated with them, and which is intended to influence them to take action which may not be solely in the interests of the Company or of the person or body employing them or whom they represent.

This policy is not meant to prohibit the following practices providing they are reasonable, proportionate and are properly recorded:

- Bonafide hospitality and promotional or other business expenditure which seeks to improve the image of the Company, cement good relations or enhance the knowledge of the Company.
- The giving or receiving of nominal ceremonial gifts.
- The offer of resources to assist the person or body to make the decision more efficiently, provided that they are supplied for that purpose only.

Gifts, entertainment and hospitality including the receipt or giving of gifts, meals or tokens of appreciation, invitations to events, functions or other social gatherings are acceptable provided they fall within reasonable bounds of value or occurrence and are given openly.

Kickbacks and Facilitation Payments

Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. If you are asked to make a payment on our behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always obtain a receipt which details the reason for the payment. If you have any suspicions, concerns or queries regarding a payment, you should raise these with your manager. Kickbacks are typically payments made in return for a commercial favour or advantage. All workers must avoid any activity that might result in a kickback being made or accepted by the Company.

Training & Communication

Training on this policy forms part of the induction process for all new workers. All existing workers will receive periodic, relevant updates on how to implement and adhere to this policy as appropriate.

Your Responsibility

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us, or under our control. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your Manager or Director as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve the right to terminate our contractual relationship with other workers if they breach this policy.

You must declare to your Manager or Director and keep a written record of all hospitality, or gifts accepted or offered. If in doubt, ask. These records may be subject to independent compliance checking at any later date.

Company Responsibility

The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations and duties and that all those under our control comply with it. The Managing Director has primary and day-to-day responsibility for implementing this policy, and for monitoring its use and effectiveness and ensuring all staff are made aware of this policy and any updates.

The Company will take appropriate action against employees whose actions are inconsistent with this policy.

Management at all levels are responsible for ensuring that those reporting to them, are made aware of and understand this policy and are given adequate and regular training on it.

How to Raise a Concern

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery, advantage, or corruption, or if you have any other queries, these should be raised initially with your Manager or Director. The Company Whistle blowing Policy gives further guidance on the actions to be taken where fraudulent or corrupt actions are perceived.

Workers who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. The Company policy is to encourage openness and we will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform HR immediately.

Monitoring and Review

The Board of Directors will review compliance with this Policy annually.

A handwritten signature in dark ink, appearing to be 'AB' followed by a long, flowing horizontal stroke.

Andy Brown

Managing Director

25 November 2024