

ANTI BRIBERY POLICY

Policy: Anti Bribery
Released by: People & Development

Valid as of: January 2025
Next review: January 2026
Reviewed and issued annually

KAEFER is committed to implementing effective measures to prevent, monitor and eliminate bribery. It is also the responsibility of all employees and associated persons to assist KAEFER in the prevention, detection and reporting of bribery, corruption and /or fraud.

All business transactions must be made in accordance with the company's procedures, and in particular all financial transactions must be made in accordance with KAEFER's scheme of delegated authority and 4 eyes policy.

A bribe can be defined as the offer, promise, giving, accepting or soliciting of a payment or benefit to a person intended as a reward or inducement to act contrary to the proper exercise of their duty, good faith or impartiality. A bribe can take the form of;

- > The direct or indirect promise, offering or authorisation of anything of value
- > The offer or receipt of any kickback, loan, fee, reward or other advantage
- > The giving of aid, donations or voting designed to exert improper influence

Employees are not permitted to give any gift, hospitality or incur any expenses in relation to a current or prospective customer, supplier or employee without first obtaining authorisation from the company's directors. (The company acknowledges that genuine business hospitality or the carrying out of promotional activities proportionate to the business is reasonable and notes that such activities are not considered Bribery by The Act 2010).

The Company strictly prohibits the giving of any donation to any political party or representative of any political party, either at local or national government level.

The Company is pleased to support local charities and considers such support as being a key part of supporting the local community in which it operates. All such donations must however be proposed to and approved by the board of directors.

The company does not operate any staff incentive or bonus scheme, which may by its nature support or encourage the use of a prohibited activity.

Reporting:

KAEFER relies on its employees and associated persons to maintain its standards of ethical conduct and we request they assist the Company in remaining vigilant in order to prevent, detect and report bribery, fraud or corruption.

Employees are encouraged to report any concerns that they may have to the People & Development Department or Local Compliance Officer in line with the Whistleblowing Procedure 085.

This policy is to be read in conjunction with Procedure 093 Anti-Bribery

Reviewed and issued annually by Laura Bowes (People & Development Director) January 2025

Next review January 2026