

ANTI BRIBERY POLICY

Policy:	Anti Bribery	Valid as of:	September 2026
Released by:	People & Development	Next review:	January 2027
		Reviewed and issued annually	

The Company 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 the Company 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 the Company's scheme of delegated authority.

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 the relevant approvals and authorisation in line with Company procedure. 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 Bribery 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 Company CEO.

Fair Competition and Anti-Trust Law Compliance

The Company is committed to conducting its business fairly and in compliance with applicable Fair Competition and Anti-Trust law. Fair Competition and Anti-Trust law is intended to protect fair competition and prevent anti-competitive behaviour.

Employees and associated persons must comply with applicable UK competition legislation, including the Competition Act 1998, the Enterprise Act 2002 and the Digital Markets, Competition and Consumers Act 2024, where applicable to the Company's activities.

Employees must not enter, encourage or facilitate arrangements with competitors that could restrict competition. This includes:

- Agreeing or coordinating prices, discounts, margins or other commercial terms with competitors.
- Agreeing to divide or allocate customers, markets, territories or projects.
- Agreeing with competitors which customers or suppliers they will or will not deal with.
- Bid-rigging, including agreeing tender prices, who will win a contract or whether a competitor will submit a genuine bid.
- Exchanging commercially sensitive information with competitors, including pricing, costs, margins, tender information, customer information, business strategies or future plans.
- Participating in cartels or any other arrangement intended to prevent, restrict or distort competition.
- Abusing a dominant market position where applicable to the Company's activities.
- Engaging in misleading commercial practices or other conduct that may breach applicable consumer protection requirements.

Particular care must be taken when attending trade association meetings, industry events or other meetings where competitors are present. Employees must not discuss or exchange commercially sensitive information unless there is a legitimate and lawful reason to do so.

Employees must immediately raise any concerns about potential anti-competitive behaviour with the People & Development Department or Local Compliance Officer in line with the Company Whistleblowing Procedure. Employees must not attempt to resolve or investigate suspected competition law breaches themselves without appropriate guidance.

Competition law breaches can result in significant financial penalties, legal action, damage to the Company's reputation and, in certain circumstances, personal liability for individuals involved. The Company therefore expects all employees and associated persons to act honestly, fairly and independently when dealing with competitors, customers and suppliers.

The Company's arrangements in place to detect and prevent anti-competitive behaviour include:

- Due diligence on relevant customers, suppliers, subcontractors, business partners and associated persons, where appropriate.
- Monitoring and review of business activities and transactions to identify potential anti-competitive behaviour.
- Providing appropriate Fair competition and Anti-Trust law training and awareness to employees and associated persons.
- Carrying out risk assessments to identify and manage competition law risks.
- Appropriate controls and approval processes for tenders, procurement and commercial arrangements.
- Controls over the sharing of commercially sensitive information, particularly when dealing with competitors.
- Reporting arrangements for employees and associated persons to raise concerns or report suspected anti-competitive behaviour.
- Investigation of reported concerns and implementation of corrective action where required.
- Regular review of competition law risks, procedures and controls to ensure they remain effective.

Reporting:

The Company 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.

No employee or associated person should suffer retaliation for raising a genuine concern in good faith in accordance with the Company's reporting procedures.

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. Non-compliance may result in disciplinary action being taken against the employee.



Chris Foulkes, Chief Executive Officer

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

Next review January 2027