

Bribery and Corruption Policy Statement

1. **Policy Statement.**

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity in all our business activities. We are also committed to enforcing effective systems to counter bribery and corruption.

2. **Who is covered by our policy?**

This policy applies to all individual employees (directors, managers, consultants, foreman and gang members whether permanent or temporary).

3. **What is bribery and corruption?**

A bribe is financial or other advantage offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantages.

Bribery or corruption is designed to influence an individual in their business activity and usually causes them to be dishonest.

4. **Gifts and Hospitality.**

This policy doesn't prohibit normal and appropriate hospitality. However, in certain circumstances gifts and hospitality are unacceptable and all our employees will not provide or receive gifts or hospitality with the intention to persuade or be persuaded to act improperly or influence performance of their normal duties.

5. **Facilitation Payments and Kickbacks.**

Our employees will not make and will not accept facilitation payments or kickbacks of any kind. Facilitation payments are usually small unofficial payments made to secure or expedite a routine action or process. Kickbacks are typically payments made in return for a business favour and advantage.

6. **Donations.**

We don't make contribution of any kind to political parties. No charitable donations will be made to gain commercial advantages.

7. **Record Keeping.**

We keep financial records and have controls in place which will evidence the business reason for making payments to third parties. All expenses claims relating to gifts, hospitality and expenses incurred to third parties must be specifically marked with the reason for the expense and then submitted to the Managing Director for approval under this policy and reimbursement.

All accounts, invoices and documents will be prepared and maintained with strict accuracy and completeness. Nothing will be kept "off-book" to facilitate or conceal improper payments.

8. **Responsibilities and Raising Concern.**

All employees have read and have had a briefing on this policy and have been told they must comply with this policy at all times. They have been encouraged to raise concerns about any issues or suspicions of malpractice. No employee will suffer any detriment as a result of raising genuine concerns about bribery and corruption, even if they were mistaken.

9. **Monitoring.**

This policy is reviewed at the monthly management meeting. Any changes or improvements will be implemented when required.

R. Marsden.

R Marsden
Director
Reviewed: 23.04.2018