



Anti Bribery, Corruption & Competition Law Policy

Introduction

The Company is committed to the highest standards of ethical conduct and integrity in its business activities. This policy outlines the Company's position on preventing and prohibiting bribery in accordance with the Bribery Act 2010.

The Company will not tolerate any form of bribery by, or of, its employees, agents or consultants or any person or body acting on its behalf.

Scope of This Policy

This policy applies to all employees and officers of the Company, and to temporary workers, consultants, contractors, agents acting for, or on behalf of the Company (associated persons) within the UK.

Every employee and associated person is responsible for maintaining the highest standards of business conduct. Any breach of this policy is likely to constitute a disciplinary, contractual and criminal matter for the individual concerned and may cause serious damage to the reputation of the Company.

The Company may also face criminal liability for unlawful actions taken by its employees or associated persons.

All employees and associated persons are required to familiarise themselves and comply with the policy at all times, including any future updates that may be issued from time to time. The policy covers: -

- the main areas of liability under the Bribery Act 2010;
- the responsibilities of employees and associated persons acting for, or on behalf of, the Company; and
- the consequences of any breaches of this policy.

Bribery Act 2010

Under the Bribery Act 2010, a bribe is a financial or other type of advantage that is offered or requested with the: -

- intention of inducing or rewarding improper performance of a function or activity; or
- knowledge or belief that accepting such a reward would constitute the improper performance of such a function or activity in the course of a person's employment, or on behalf of another company or individual, where the person performing that activity is expected to perform it in good faith, impartially, or in accordance with a position of trust.

A criminal offence will be committed under the Bribery Act 2010 if: -

- an employee or associated person offers, promises, gives, requests, receives or agrees to receive bribes; and
- the Company does not have the defense that it has adequate procedures in place to prevent bribery by its employees or associated persons.



What is Prohibited?

The Company prohibits employees or associated persons from offering, giving, soliciting or accepting any bribe. The bribe might be cash, a gift or other inducement to, or from, any person or company, whether public or government official, an official of a state-controlled industry, political party, or a private person. The bribe might be made to ensure that a person or company improperly performs duties or functions to gain commercial, contractual or regulatory advantage for the Company and/or its employees or associated persons.

This prohibition also applies to indirect contributions, payments or gifts made in any manner as an inducement for improper performance through third parties or agents.

Records

Employees, and where applicable, associated persons are required to ensure that all Company records are accurately maintained in relation to any contracts or business activities i.e., financial invoices and all payment transactions with clients, suppliers and public officials.

Due diligence should be undertaken prior to entering into any contract, arrangement or relationship with a potential supplier of goods and services in accordance with Company's procedures.

Employees and associated persons are required to keep accurate, detailed and up to date records of all corporate hospitality, entertainment or gifts accepted or offered.

Any gift or corporate hospitality having a value in excess of £20 should be registered with the Managing Director.

Facilitation Payments

The Company prohibits its employees or associated persons from making or accepting any facilitation payments. These are payments made to public officials for carrying out or speeding up routine procedures.

Where a public official has requested a payment, employees or associated persons should ask for further details of the purpose and nature of the payment in writing.

The Company will seek the assistance of the relevant employee in its investigation and may determine that the matter should be referred to the prosecution authorities.

If the public official provides written details and it is concluded that the payment is a legitimate fee, the Company will authorise the payment.

Corporate Entertainment, Gifts, Hospitality and Promotional Expenditure

The Company permits corporate entertainment, gifts, hospitality and promotional expenditure that are undertaken: -

- for the purpose of establishing or maintaining good business relationships;
- to improve the image and reputation of the Company; or
- to present the Company's products and services effectively; provided that it is arranged in good faith,



and

- not offered, promised or accepted to secure an advantage for the Company or any of its employees or associated persons or to influence the impartiality of the recipient.

The Company will authorise only reasonable, appropriate and proportionate entertainment and promotional expenditure.

Employees and where appropriate associated parties should submit requests for proposed hospitality and promotional expenditure well in advance of proposed dates to their Line Manager in accordance with this policy.

Employees will be required to set out in writing: -

- objective of the proposed client entertainment/expenditure
- identify those who will be attending
- the organisation that they represent; and
- details of the proposed activity

The Company will approve business entertainment proposals only if they demonstrate a clear business objective and are appropriate for the nature of the business relationship.

If an employee or associated person wishes to provide gifts to suppliers or other business contacts prior written approval is required, together with details of the intended recipients. The requests to be authorised by the Managing Director and subject to a cap of £50 per recipient.

Charitable Donations

The Company considers that charitable giving can form part of its wider commitment and responsibility to the community. The Company supports charities that are selected in accordance with objective criteria. The Company may also support fundraising events involving employees.

Risk Management

The Company has established detailed risk management procedures to prevent, detect and prohibit bribery. The Company will conduct risk assessments for each of its key business activities on a regular basis.

Reporting Suspected Bribery

The Company depends on its employees and associated persons to ensure that the highest standards of ethical conduct are maintained in all its business dealings. Employees and associated persons are requested to assist with the Company and remain vigilant in preventing, detecting and reporting bribery.

Employees and associated persons are encouraged to report any concerns that they may have to their Line Manager or Head of Human Resources as soon as possible.

Employees are also required to comply with the Company's Malpractice Policy. This policy is available from Human Resources.

Employees or associated persons who report instances of bribery in good faith will be supported by the Company. The Company will ensure that the individual is not subjected to detrimental treatment as a



consequence to his/her report. Any instances of detrimental treatment by a fellow employee because an employee has made a report will be treated as a disciplinary matter. An instruction to cover up wrongdoing is itself a disciplinary matter. If told not to raise or pursue any concern, even by a senior authority, employees and associated persons should not agree to remain silent. They should report the matter to Head of Human Resources.

Competition Law

ATD Civils & Groundworks Limited are committed to ensuring that, as a company, we comply with various legal and regulatory requirements which are designed to ensure that market competition, nationally and internationally, is not restricted, prevented or distorted.

Failure to comply can result in extremely high financial repercussions and, in some instances, can be deemed as a criminal offence for individuals who facilitate or are personally involved in price-fixing, market-sharing, bid-rigging or other cartel agreements/arrangements between competing firms.

All employees should be aware that any infringements of the guidance or procedures in this document will be viewed very seriously and that any employee who violates or knowingly permits a subordinate to violate the laws against anticompetitive practices and/or bribery/corruption will be subject to disciplinary action, up to termination of employment.

Action By The Company

The Company will fully investigate any instances of alleged or suspected bribery. Employees suspected of bribery may be suspended from their duties while the investigation is being carried out. The Company will invoke its disciplinary procedures where any employee is suspected of bribery, and proven allegations may result in a finding of gross misconduct and result in immediate dismissal.

The Company may terminate the contracts of any associated persons who act for, or on behalf of, the Company who are found to have breached this policy.

The Company may also report any matter to the relevant authorities. The Company will provide all necessary assistance to the relevant authorities in any subsequent prosecution.

The Company reserves the right to amend and update this policy as required.

This policy does not form part of employees' contract of employment.

Signed: 

Director: A NICHOLLS

Date: September 2025

ATD CIVILS & GROUNDWORKS LIMITED