

Anti-Bribery and Corruption Policy

Statement and Purpose of Policy

1. As involvement in bribery and corruption exposes, Essex Groundwork Supplies Ltd (the Business) and its employees to a criminal offence, damages the Business reputation and confidence of our customers and suppliers. The Business is committed to conducting its business in an honest and ethical manner.
2. Bribery and corruption are criminal offences in most countries where the business conducts its business and operations. As a UK- registered company, the Business is subject to the Bribery Act 2010 (the Act).
3. The Business has a zero-tolerance approach towards bribery and corruption anywhere in its business and is committed to
 - a. acting in a professional and fair manner.
 - b. acting with integrity in all its business dealings and relationships and
 - c. implementing and enforcing effective systems to counter bribery and corruption.

What Does this Policy Cover?

4. This policy covers bribery and corruption taking place anywhere in the Business (within the UK and Abroad)
5. This policy sets out the steps everyone in the business must take to prevent bribery and corruption within the Business, in accordance with the relevant legislation and business requirements.
6. This policy does not form part of any employment contract, and the Business retains the right to amend it at any time, at its absolute discretion.

What are Bribery and Corruption?

7. A “bribe” is any inducement or reward that is offered, promised, requested or provided in order to gain a commercial, contractual regulatory or personal advantage. In most cases, a bribe will be a financial or other advantage given to a person in order for them to perform a relevant function or activity, improperly, or reward them for doing so.

A Bribe, in the form of financial or other advantage, may include:

- a. Money (whether in the form of cash or cash equivalent)
- b. Gifts
- c. Hospitality and entertainment.
- d. Loans
- e. Services
- f. Preferential treatment
- g. Discounts and
- h. Promises to provide financial or other advantages in the future

B. For something to be considered a bribe and the subject of this policy

- a. The timing of the bribe is irrelevant and any payments made, or advantages given, after a relevant event are considered bribes.
- b. The payment made, or advantage given, can be given or received unknowingly and
- c. It is also not necessary for the bribed party to actually receive a benefit as a result of the bribe.

8. "Bribery" includes:
 - a. Giving, offering or promising a bribe
 - b. Requesting, receiving or agreeing to receive a bribe or
 - c. Bribing a foreign public official (as defined in the Act)
9. Corruption is the misuse of power or office for private gain.
10. This means that no one should:
 - a. Offer or provide a bribe (e.g. any payment, gift, hospitality or other benefit) to reward the business advantage received, or in the expectation that a business advantage will be received
 - b. Accept a third party's offer that they know or suspect to be made with the expectation that it will provide a business advantage (to the third party or anyone else)
 - c. Fail to prevent bribery and corruption from occurring
11. No one must intimidate, threaten or retaliate against another person who has refused to accept or offer a bribe or who has raised concerns under this policy.
12. For the purpose of this policy, it does not matter whether
 - a. Bribery and corruption occur in the UK or abroad Any act of bribery or corruption committed outside of the UK may be prosecuted in the UK or
 - b. The act of bribery and corruption is committed directly or indirectly.

Who Can Be Involved in Bribery and Corruption?

13. Bribery and corruption can be Committed by:
 - a. Any worker of the Business, irrespective of seniority, tenure and working hours, including all employees, and directors (staff)
 - b. Anyone otherwise authorised to act on the behalf of staff
 - c. The Business representatives and any other third parties who act on the business's behalf
 - d. The Business suppliers and
 - e. The Business customers (e.g. a customer may attempt to induce someone working for the business to give that customer more favourable treatment.
14. This Policy and the rules contained within it apply to those listed in Paragraph 13 above.

In What Circumstances Can Bribery and Corruption Occur?

15. Bribery and corruption can take place in the any sector.
16. Typically, the person receiving the bribe can influence the progress of or be aware of relevant business due to their position.

Who Is Responsible for This Policy?

17. The Directors has overall responsibility for this policy.
18. Peter Tyrer-Jolley is the primary person responsible for implementing this policy. They will also monitor the policy use and effectiveness and ensure it is adhered to.
19. Management personnel at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on Bribery and Corruption.

Gifts and Hospitality.

20. All Staff are forbidden from soliciting any gifts or hospitality in the course of their work for the Business.
21. All Staff are forbidden from offering or receiving gifts or hospitality which are unduly lavish, extravagant or otherwise inappropriate from any person or organisation which has had or may have influence over the Business. The following is a non- exhaustive list of gifts and hospitality the Business deems inappropriate.
 - a. Gifts, be they personal or corporate.
 - b. Any gifts that include cash or cash equivalents (including, but not limited to Vouchers)
 - c. Any hospitality or gifts given or received in secret.
 - d. Any hospitality or gifts received in the name of an individual rather than the Business name.

Keeping Records.

22. As transparency is crucial and false or misleading records could be damaging to the Business, it is essential that the Business keeps a full and accurate record of all financial transactions. Under relevant money laundering regulations. The Business accounts are required to report anything that seems irregular.
23. As a result, Staff must declare and properly record in writing all hospitality and gifts received or given. In relations to any hospitality, gifts or payments to third parties (including suppliers and customers), staff must:
 - a. Submit expense claims and record in writing the reason for the expenditure.
24. All accounts, invoices, purchase orders, credit notes and other records relating to third parties must be accurately and fully prepared in accordance with the Business procedures and requirements.

Reporting Issues Related to Bribery and Corruption.

25. All staff have a responsibility to comply with this Policy and prevent bribery and corruption. Staff who
 - a. Witness or otherwise discover anything corrupt or otherwise improper taking place.
 - b. Are offered a bribe
 - c. Are asked to offer a bribe or
 - d. Suspect or discover that any bribery or corruption has taken place may or may take place,Must notify their managers and the legal department as soon as possible. Staff can do this anonymously. As staff must report issues related to bribery and corruption as soon as possible, any delays will need to be explained.

Consequences of Non-Compliance

26. The Business takes compliance with this policy very seriously and failure to comply with the policy puts both the Staff and Business at significant risk.
27. Staff who fail to comply with the policy may commit a criminal offence and the criminal law relating to bribery and corruption carries several penalties.
28. Due to the importance of this policy, failure to comply with any of its procedures and requirements may result in disciplinary action and or dismissal for gross misconduct.
29. If you have any questions or concerns about anything in this policy, please contact Emma Tyrer-Jolley.

Signed: _____

Director on behalf of Essex Groundwork Supplies Ltd

Date: 17/10/2025

