

## 1. Purpose

The purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery and corruption regulations, including the **Bribery Act 2010** and the **Economic Crime and Corporate Transparency Act 2023**. It ensures that Avondale Construction Limited conducts business in a socially responsible, ethical, and lawful manner.

## 2. Statement

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal or a breach of trust. Avondale Construction Limited takes a zero-tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing effective systems to counter bribery.

## 3. Scope

This policy applies to all individuals working at all levels and grades, including senior managers, officers, directors, employees (permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, casual workers, agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries or their employees, wherever located.

## 4. Covered Areas

This policy covers: Bribes; Gifts and hospitality; Facilitation payments; Political contributions; Charitable contributions. Avondale construction permits the acceptance of gifts and hospitality, provided they comply with the conditions outlined in this policy.

## 5. Bribes

**Employees must not engage in any form of bribery, either directly or through any third party. Specifically, employees must not bribe a foreign public official anywhere in the world.**

## 6. Gifts and Hospitality

Employees must not offer or accept any gift or hospitality which could be regarded as illegal or improper, or which violates the recipient's policies, unless approved in writing by their manager. If the manager is below Director Level, then approval must be sought from an appropriate Director. Gifts must be reasonable and justifiable. All approvals must be recorded in the company's gift register.

## 7. Facilitation Payments and Kickbacks

Facilitation payments are strictly prohibited. These are unofficial payments made to secure or expedite routine actions by public officials. **Our strict policy is that facilitation payments must not be paid**

## 8. Political Contributions

Avondale Construction does not make donations in cash or kind to political parties or candidates. Such contributions can be perceived as attempts to gain improper business advantage.

## 9. Charitable Contributions

All charitable donations must be approved in writing by a director and made to registered charities. Contributions must be recorded and **must not be used to secure business advantage. All charitable contributions should be publicly disclosed.**

**All financial records** are to have appropriate internal controls in place which will evidence the business reason for making payments to third parties. You must declare and keep a written record of

all hospitality accepted or offered, which will be subject to managerial review. You must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with our expenses policy and specifically record the reason for the expenditure. All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. **No accounts** must be kept "off-book" to facilitate or conceal improper payments.

## 10. Whistleblowing Procedures

Employees are encouraged to report any concerns about bribery or corruption through confidential whistleblowing channels. Reports will be investigated promptly and fairly. Whistleblowers are protected from retaliation or victimisation when reporting in good faith.

## 11. Employee Responsibilities

As an employee it a requirement that you read, understand and comply with this policy. The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. Employees must act with integrity and report any suspected bribery or corruption. They must avoid accepting gifts or hospitality that could influence decisions and disclose conflicts of interest.

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries or concerns, these should be raised with your line manager or the Company director or again through our whistle blowing policies and procedures

**Any employee who breaches this policy will face disciplinary action**, which could result in **dismissal for gross misconduct**. We reserve our right to terminate our contractual relationship with other workers if they breach this policy.

## 12. Support for Victims of Bribery or Corruption

Employees who believe they are victims of bribery or corruption should report the incident immediately. The company will provide support and ensure confidentiality throughout the investigation.

Employees who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment because of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform HR immediately. If the matter is not remedied, and you are an employee, you should raise it formally using the company's Grievance Procedure

**Our Zero-tolerance approach** to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

### **13. Who is responsible for the overall policy? who is responsible for the Monitoring and Reviewing of policy**

The Managing Director has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. Quality Assurance Manager has primary and day-to-day responsibility for implementing this policy and for monitoring its use and effectiveness and dealing with any queries on its interpretation. Management at all levels are responsible for ensuring those reporting to them is made aware of and understand this policy and are given adequate and regular training on it.

**The Quality Manager** is responsible for monitoring the implementation of this policy. Regular audits and reviews will be conducted. The policy will be reviewed annually or upon legislative changes.

**This policy does not form part of any employee's contract of employment, and it may be amended at any time.**

Signature:



**Managing Director**

Mr. Nick Curran

Dated 25/09/2025