

## Anti-Corruption and Bribery Policy

### Introduction

This policy sets out how Avondale Construction Limited (the **Company, we, us or our**) approaches the prevention of bribery and corruption in all our business activities and maintaining the highest standards of ethical conduct.

### Who does this policy apply to?

This policy applies to all persons working for us, or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners, sponsors, or any other person associated with us, wherever located.

### Who is responsible for this policy?

All managers must:

- ensure their team members understand and follow this policy
- address concerns or breaches fairly and consistently
- consult senior management when unsure how to apply this policy.

All staff must comply with this policy and raise any concerns they may have.

### Non-compliance

If you are an employee, worker or agency worker, you should raise any concerns about potential breaches of this policy with your manager. Other staff should speak to their contact in the Company. We may act under our disciplinary procedure if you are an employee and you fail to comply with this policy. In the case of workers, agency workers and contractors, if you breach this policy we may terminate your engagement.

### Questions about this policy

Contact your manager if you have questions about this policy or how it applies to you.

#### 1. Policy statement

- 1.1 We conduct all our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery and corruption.
- 1.2 We take our legal responsibilities very seriously. We will uphold all laws relevant to countering bribery and corruption. However, we remain bound by UK laws, including the Bribery Act 2010, in respect of our conduct both at home and abroad.
- 1.3 The purpose of this policy is to:
  - (a) set out our responsibilities, and of those working for and on our behalf, in observing and upholding our position on bribery and corruption; and
  - (b) provide information and guidance to those working for and on our behalf on how to recognise and deal with bribery and corruption issues.
- 1.4 This policy applies to all persons working for us, or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners, sponsors, or any other person associated with us, wherever located.

#### 2. What is bribery?

**Bribe** means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit.

**Bribery** includes offering, promising, giving, accepting or seeking a bribe.

- 2.1 We strictly prohibit all forms of bribery. If you are unsure about whether a particular act constitutes bribery, raise it with your manager.
- 2.2 Specifically, you must not:
  - (a) give or offer any payment, gift, hospitality or other benefit in the expectation that a business advantage will be received in return, or to reward any business received;

- (b) accept any offer from a third party that you know or suspect is made with the expectation that we will provide a business advantage for them or anyone else;
- (c) give or offer any payment (sometimes called a facilitation payment) to a government official in any country to facilitate or speed up a routine or necessary procedure.

2.3 You must not threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.

### 3. Facilitation payments and kickbacks

**Facilitation payments**, also known as "back-handers" or "grease payments", are typically small, unofficial payments made to secure or expedite a routine or necessary action (for example, by a government official). They are not common in the UK but are common in some other jurisdictions [in which we operate].

**Kickbacks** are typically payments made in return for a business favour or advantage.

- 3.1 We do not make, and will not accept, facilitation payments or "kickbacks" of any kind.
- 3.2 You must avoid any activity that might lead to a facilitation payment or kickback being made or accepted by us or on our behalf, or that might suggest that such a payment will be made or accepted. If you are asked to make a payment on our behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt which details the reason for the payment. If you have any suspicions, concerns or queries regarding a payment, you should raise these with the Compliance Manager.

### 4. Gifts and hospitality

- 4.1 This policy does not prohibit the giving or accepting of reasonable and appropriate hospitality for legitimate purposes such as building relationships, maintaining our image or reputation, or marketing our products and services. You must declare to your manager and keep a written record of all hospitality or gifts given or received.
- 4.2 We will not consider a gift or hospitality appropriate if it is unduly lavish or extravagant or could be seen as an inducement or reward for any preferential treatment (for example, during contractual negotiations or a tender process).
- 4.3 Any gift offered, given, or received must be reasonable, proportionate, transparent, and for a legitimate business purpose. Gifts must not influence, or appear to influence, any business decision or create a conflict of interest. Cash, cash equivalents (including gift cards, vouchers, loans, or securities), and gifts given in secret are strictly prohibited. All gifts must be given or accepted on behalf of the Company and must comply with the Company's Anti-Bribery and Corruption Policy. Where required, gifts must be declared and recorded in the Company's Gifts and Hospitality Register.
- 4.4 Gifts must be of an appropriate type and value depending on the circumstances and taking account of the reason for the gift. Gifts must not include cash or cash equivalent (such as vouchers) or be given in secret. Gifts must be given in our name, not your name.
- 4.5 Employees may give or accept modest promotional items of low value, such as branded stationery, calendars, or similar corporate merchandise, where these are customary, infrequent, transparent, and unlikely to influence business decisions. Any such items must comply with the Company's Anti-Bribery and Corruption Policy and any approval or reporting requirements in place.
- 4.6 Any gift or hospitality that exceeds a value determined by the Company, or which may reasonably be perceived as influencing a business relationship or decision, must be approved in advance by a director and recorded in the Gifts and Hospitality Register.

### 5. Record-keeping

- 5.1 You must declare and keep a written record of all hospitality or gifts given or received. You must also submit all expenses claims relating to hospitality, gifts or payments to third parties in accordance with our expenses policy and record the reason for expenditure.
- 5.2 You should prepare all accounts, invoices, and other records relating to dealings with third parties including suppliers and customers with strict accuracy and completeness. You must not keep accounts "off book" to facilitate or conceal improper payments.

### 6. How to raise a concern

- 6.1 If someone offers you a bribe, or asks you to make one, or if you suspect that any bribery, corruption or other breach of this policy has occurred or may occur, you must notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible.
- 6.2 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 the Compliance Manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

**6.3 Potential risk scenarios "red flags" may include:**

- (a) you become aware that a third party engages in, or has been accused of engaging in, improper business practices;
- (b) a third-party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made;
- (c) a third party requests that you provide employment or some other advantage to a friend or relative; and
- (d) you receive an invoice from a third party that appears to be non-standard or customised.

**7. Breaches of this policy**

- 7.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 7.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.