

## Anti-Bribery Policy

### **Definitions**

In this policy, “we”, “us”, “EPCL” and “the Company” means Elite Precast Concrete.

“Bribe” means an inducement or reward offered, promised or provided in orders to gain any commercial, contractual, regulatory or personal advantage.

“Relevant Person” means any individual (whether an employee of the Company, temporary worker, contractor or consultant providing services to or on behalf of EPCL) or any corporate entity who performs functions for or on behalf of EPCL.

### **Introduction**

This policy sets out Elite Precast Concrete Limited commitment to operating its business with integrity. We are committed to promoting and maintaining the highest levels of ethical standards in relation to business activities. We make it clear that we do not tolerate bribery and corruption and are committed to acting fairly and with integrity in all of our business dealings and relationships and to implementing and enforcing effective systems to counter bribery.

This policy applies to all Relevant Persons as explained above and extends throughout our business dealings and transactions in all countries in which we operate. We encourage the adoption of this policy amongst our business partners including contractors, suppliers and customers.

### **Purpose and scope of this policy**

This Policy sets out the actions all of us must take to prevent bribery and corruption in our business and to comply with relevant legislation. It is aimed at:

- Ensuring compliance with anti-bribery laws, rules and regulations, not just within the UK but in any other country within which the Company may carry out its business or in relation to which its business may be connected.
- Enabling any Relevant Person to understand the risks associated with bribery and to encourage them to be vigilant and effectively recognise, prevent and report any wrongdoing, whether by themselves or others.
- Providing suitable and secure reporting and communication channels and ensuring that any information that is reported is properly and effectively dealt with.
- Creating and maintaining a rigorous and effective framework for dealing with any suspected instances of bribery or corruption.

All Relevant Persons are expected to adhere to the principles set out in this Policy.

## **The Bribery Act 2010**

The Bribery Act 2010 came into force on 1 July 2011. The Bribery Act affects the Company in its business relations anywhere in the world.

Under the Bribery Act it is an offence to:

- Bribe a person i.e. to offer, promise or give a financial or other advantage to another person, whether within the UK or abroad, with the intention of inducing or rewarding improper conduct.
- Receive a Bribe i.e. to request, agree to receive or accept a financial or other advantage for or in relation to improper conduct.
- Bribe a foreign public official; and
- Fail to prevent Bribery

## **Risks of not acting with integrity**

The involvement of Bribery or corruption carries many risks, amongst which are:

- At risk of blackmail
- Subject to unlimited fines
- Imprisonment of up to 10 years
- Reputational damage
- Increased costs of doing business, such as insurance
- Unable to recruit a skilled workforce

## **Acting with integrity**

Equally, there are clear benefits to acting with integrity, these include:

- Increased likelihood of being selected as a supplier
- Brand value
- We remain in good standing with our banks and own suppliers

## **Policy Statement**

All Relevant Persons and Associated Persons are required at all times to:

- Not commit an offence listed under The Bribery Act 2010 as stated above or any other offence.
- Comply with the Bribery Act 2010 and any other anti-bribery and anti-corruption legislation that applies within the UK.
- Act honestly, responsibly and with integrity
- Safeguard and uphold the core values of EPCL by operating in an ethical, professional and lawful manner

Bribery of any kind is strictly prohibited. Under no circumstances should any provision be made, money set aside or accounts created for the purposes of facilitating the payment or receipt of a Bribe.

If in doubt, you should seek appropriate guidance from the Company's Directors. All Relevant Persons and all Associated Persons are expected to adhere strictly at all times to the guidelines set out in this Policy.

## Gifts and Hospitality

Occasionally the Company provides gifts and hospitality to clients, customers, contractors and suppliers. This is not prohibited by the Bribery Act 2010 provided the following requirement are met:

- The gift is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage.
- It complies with UK law
- It is given in the Company's name, not in the giver's personal name
- It does not include cash or a cash equivalent (such as gift vouchers);
- It is of an appropriate and reasonable value and given at an appropriate time
- It is given openly and not kept secret
- It is approved in advance by a director of the Company

In summary, it is not acceptable to give, promise to give or offer a payment, gift or hospitality with the exception or hope that a business advantage will be received, to reward a business advantage already given, or to accept a payment, gift or hospitality from a third party that you know or suspect is offered or provided with the expectation that it will obtain a business advantage for them.

## Facilitation Payments

The Company operates within the UK only, where facilitation payments are not commonly paid, but they are common in some other countries - Any payment or gift to a public official or other person to secure or accelerate the prompt or proper performance of a routine government procedure or process, otherwise known as a "facilitation payment", is strictly prohibited.

## Indicators of Bribery

Common indicators of corruption include those listed; however, this is not exhaustive and there may well be others.

- Payments are for abnormal amounts (e.g. commission), or made in an unusual way, e.g. what would normally be a single payment is made in stages, through a bank account never previously used, or in a currency or via a country which has no connection with the transaction.
- Individuals are secretive about certain matters or relationships and/or insist on dealing with them personally. They may make trips at short notice without explanation, or have a more lavish lifestyle than expected.
- Decisions are taken for which there is no clear and rational rationale
- Records are incomplete or missing

## Political Contributions

Political contributions can be seen as Bribes in disguise; therefore, we do not make any political donations

## Charitable Donations

Bribes can be disguised as charitable donations. All charity donations are approved by a Director before being offered or paid.

## Local Circumstances

As we operate in the UK only, we do not pay or accept bribes. However, we understand that different parts of the world have different social and cultural customs. This does not affect our position that we do not pay or accept bribes or act corruptly: we do not and will not.

## Exceptional Circumstances

In some circumstances a payment is justifiable. If one of our people is faced with a threat to their personal safety or that of another person if a payment is not made, they should pay it without fear of recrimination.

If this happens, a Director must be contacted as soon as possible, and the payment and the circumstances in which it was made must be fully documented and reported within five working days.

## Responsibility to Report and the Reporting Procedure

All Relevant Persons are contractually required to take whatever reasonable steps are necessary to ensure compliance with this Policy and to prevent, detect and report any suspected Bribery or corruption. All Relevant Persons have a duty to prevent, detect and report any incident of Bribery and any potential risks of Bribery.

If you suspect or know that any Relevant Person plans to offer, promise or give a Bribe or to request, agree to receive or accept a Bribe in connection with the Company's business, you must report it to a Director, named below:

Richard Doody – Commercial Director – rich@eliteprecast.co.uk

Owen Batham – Sales and Marketing Director – owen@eliteprecast.co.uk

Paul Cartwright – Business Development Director – paul@eliteprecast.co.uk

Mark Whistance – Operations Director – mark@eliteprecast.co.uk

## As soon as possible to allow appropriate action to be take promptly

The Company is committed to taking appropriate action against Bribery and corruption. This may include either reporting the matter to an appropriate external Government department, regulatory agency or the police and/or taking internal disciplinary action against relevant employees and/or terminating contracts with associated persons.

The Company will keep your disclosure confidential during any investigation it undertakes, to the extent that this is practical and appropriate in the circumstances.

The Company will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken.

The Company is also committed to ensuring nobody suffers any detrimental treatment as a result 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 corruption offence has taken place or may take place in the future or because they may assist in the investigation of an allegation of Bribery or corruption.

### **Record Keeping**

All accounts, receipts, invoices and other documents and records relating to dealings with third parties must be prepared and maintained with strict accuracy and completeness. No accounts must be kept “off the record” to facilitate or conceal improper payments.

### **Monitoring Compliance**

It is the responsibility of the Company’s Director to ensure compliance with this Policy. They are responsible for monitoring its effectiveness and compliance with the Company’s legal and ethical obligations

### **Training**

The Company will provide training to all employees to help them understand their responsibilities under this Policy.

The Company’s zero tolerance approach to Bribery will be communicated to all business partners at the beginning of the business relationships and as appropriate thereafter.

### **Breach of Policy**

Any breach of this Policy by any Relevant Person, who is an employee of the Company will constitute a disciplinary offence and will be dealt with in accordance with the Company’s disciplinary procedure. Depending on the gravity of the offence, it may be considered gross misconduct and could render an employee liable to dismissal.

Breach of this Policy by a temporary worker, contractor or consultant, providing a service may lead to the immediate termination of that contract or engagement by Elite Precast Concrete.

Breaches by a corporate entity could lead to the suspension or termination of a contract, subcontract or other agreement between the corporate entity and the Company.

If you have any questions about this Policy, please contact any of the Directors as named within the document.



Richard Doody  
Commercial Director