

## **ANTI - BRIBERY AND CORRUPTION POLICY**

PCF Construction as an organisation acknowledges that Bribery and Corruption in any form undermines democracy, the rule of law and poses a very serious threat to sustained economic progress.

This document sets out the rules PCF Construction in relation to Anti-Bribery and Corruption matters in the United Kingdom.

Compliance with the Company's policy in relation to bribery and corruption is regarded as part of our employee contract of employment. Should you as an employee for any reason fail to follow the procedures set out in this document, action may be taken against you which may result in dismissal.

**Bribery** is the offer or receipt of any gift, loan, payment, reward or other advantage to or from any person as an encouragement to do something which is dishonest, illegal or a breach of trust, whilst acting in the engagement of the Company's business.

**Corruption** is the misuse of entrusted power for personal gain.

To place this into context you should be aware that, should you engage in activities which are contrary to UK anti-bribery and corruption legislation as dictated in the Bribery Act 2010, you could face up to 10 years in prison and/or an unlimited fine.

The Company may also be liable to an unlimited fine and Government sanction should it be determined that the Company did not effectively act to prevent such acts.

PCF Construction brings the following extract to the attention of its employees.

*A commercial organisation commits a criminal offence under s.7 of the Bribery Act 2010 (which came into force on 1<sup>st</sup> July 2011) if it fails to prevent bribery that is intended to obtain or retain business, or an advantage in the conduct of business, for the organisation. An organisation will have a defence to this corporate offence if it can show that it had in place "adequate procedures" designed to prevent bribery by or of persons associated with the organisation.*

This policy document is not regarded as exhaustive but sets out the guidelines and procedures which should be followed.

If you are at any time uncertain as to whether your actions will comply with this policy, you must seek guidance from the Director.

### **PCF Construction expects that you should always act in accordance with the following provisions: -**

- Behave honestly, be trustworthy and set a good example.
- Use the resources of the Company in the best interests of the Company and do not misuse those resources.
- Make a clear distinction between the interests of the Company and your private interests to avoid any conflict of interest, and if such conflict does arise you should report it to the Director immediately.
- Ensure that any community support, sponsorship and charitable donations do not constitute bribery, and if in doubt you should consult the Director.
- Confidentially report all incidents, risks and issues which are contrary to this policy document to the Director.

- Raise any issues regarding anti-bribery and corruption laws and the Company's policies. Queries will be dealt with anonymously and a written response will be issued.
- Do not offer or accept bribes.

**Gifts** such as flowers, vouchers, food and drink are deemed to be presents. Event and travel tickets given to you as an individual are also gifts when they are not to be used in a hosted business context.

**Hospitality** includes invitations to hosted meals, receptions and events for business purposes.

Do not offer money to any public officials in order to speed up service or gain improper advantage. This type of bribery is a 'facilitation payment' and is illegal. If you are faced with a demand for a facilitation payment you must:

1. Actively resist the payment
2. Inform the Director

The UK anti- bribery and corruption legislation applies to all activities of a UK-based business no matter where they are carried out in the world. This policy therefore applies to ALL activities worldwide, whatever the local law, practice or custom may be.

By complying with this policy document, we aim to ensure that you as an employee and the PCF Construction do not at any time knowingly breach any relevant anti-bribery and corruption legislation and, that by adhering to the Policy our Company shall demonstrate that it has adequate procedures in place to prevent such activity.

You as an employee have a moral and independent obligation to prevent bribery and corruption within the Company and, to ensure that any interaction with others whilst conducting the company business complies with this policy document and relevant laws.

### **Competition Law**

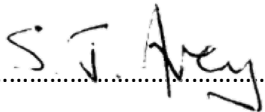
PCF Construction requires compliance with all applicable laws, including competition law. This requirement applies to all business dealings and transactions undertaken by the Company, in all countries where it operates.

Competition law is designed to ensure that businesses compete fairly and do not engage in practices that prevent, restrict or distort competition within the marketplace.

This section of the policy applies to all staff, including directors, employees, temporary personnel, contract personnel, consultants, intermediaries, agents and any third parties acting on behalf of Company Name. All such persons are required to comply with this policy at all times.

Any breach of competition law, whether intentional or unintentional, is taken seriously and may result in significant consequences for both the individual and the Company. These consequences may include significant financial penalties, criminal prosecution which may result in fines or imprisonment, legal action for compensation by affected parties, contracts being declared void or unenforceable, and the Company being prohibited from participating in public tenders.

If there is any uncertainty regarding compliance with competition law, guidance must be sought from the Director prior to proceeding with any action. Any concerns or suspected breaches must be reported immediately in accordance with this policy.

Signed: .....  .....

Date: 29/04/26.....

Steve Avery  
Director