

SMITH BROTHERS BUILDERS LTD: ANTI-BRIBERY & CORRUPTION POLICY

1. Core Principle

Smith Brothers Builders Ltd (“the Company”) operates with a commitment to professional integrity and transparency. We maintain a zero-tolerance stance toward any form of bribery or corruption. It is our fundamental requirement that all business dealings are conducted ethically and in full compliance with the laws of the United Kingdom, specifically the **Bribery Act 2010**.

2. Scope and Application

This policy is mandatory for all Company personnel, including directors, senior management, and all employees (permanent, temporary, or fixed-term). While we do not dictate the internal policies of external partners, **Smiths** expects and encourages equivalent ethical standards from all consultants, subcontractors, and service providers acting on our behalf.

3. Defining Bribery

Under this policy, a bribe is defined as the offering, promising, giving, or accepting of any financial or other incentive intended to:

- Induce or reward the improper performance of a professional function or duty.
- Exert improper influence over a public official in the execution of their official role.

4. Prohibited Conduct

The Company strictly prohibits the following:

- **Direct or Indirect Bribes:** Offering or accepting incentives through any third party.
- **Facilitation Payments:** Small, unofficial payments made to secure or speed up routine administrative actions (often referred to as "grease payments").
- **Kickbacks:** Payments made in exchange for business favours or preferential treatment.

5. Corporate Hospitality and Gifts

Smiths recognises that modest hospitality and seasonal gifts are established parts of building business relationships. These are not prohibited, provided they meet the following criteria:

- **Proportionality:** They must be reasonable, transparent, and appropriate for the industry.
- **Intent:** They must never be intended to influence a decision or gain an unfair advantage.
- **Transparency:** All hospitality and gifts must be declared and handled in accordance with our internal ethics guidelines. We will never provide gifts to public officials to influence their professional duties.

6. Charitable Contributions

The Company supports and encourages charitable giving. However, we must ensure that donations are never used as a vehicle to mask bribery. All donations made by **Smiths** must be legal, ethical, and made without the expectation of commercial gain.

7. Financial Integrity and Record Keeping

To prevent "off-book" transactions, **Smiths** maintains rigorous financial controls:

- Every payment to a third party must have a documented, legitimate business reason.
- All expense claims for hospitality or gifts must be submitted through our standard expenses process, clearly stating the purpose of the spend.
- Invoices, receipts, and accounts must be maintained with total accuracy and completeness.

8. Reporting Concerns (Whistleblowing)

We encourage a culture of openness. If an employee suspects malpractice or is unsure if an action constitutes bribery, they should report it immediately to a Director. **Smiths** guarantees that no employee will face detrimental treatment or retaliation for reporting a genuine concern in good faith, even if the suspicion proves unfounded.

9. Training and Oversight

- **Induction:** Anti-bribery awareness is a standard part of the induction for all new staff.
- **Ongoing Support:** Existing employees will receive periodic updates and training to ensure continued compliance.
- **Monitoring:** The Board of Directors will regularly audit internal systems and review this policy to ensure it remains effective and relevant.

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