



We, the Directors of SDC Builders Ltd are committed to running our business free from discreditable behaviour of any kind and be known for our honesty and integrity. We refuse to offer, give or receive bribes of any nature to obtain or retain existing business or secure any improper advantage and we will not use or allow others to do such things for us.

We will never knowingly seek to gain advantage of any kind by acting fraudulently, deceiving people or by making false claims and we will not allow anyone else to do so on our behalf.

The Company has built its business to benefit its employees and our customers and we aim to encourage ethical and anti-bribery values to all employees of the company. Where we rely on the services of sub-contractors and consultants, we would expect them to accept the terms of this policy or to have their own policy which sets out standards to match our own.

Organisation

All employees of the company need to understand and recognise bribery and corruption so they can take the appropriate action to guard against it.

Definition

Bribery is the accepting of gifts, money, hospitality or other favours in return for providing something of value to the briber. The purpose of this policy is to set out the rules that must be followed in the company to ensure that bribery does not occur.

Unacceptable Behaviour

The following behaviour is unacceptable and must not occur within the company:

- accepting any financial or other reward from any person in return for providing some favour
- requesting a financial or other reward from any person in return for providing some favour
- offering any financial or other reward to any person in return for providing some favour.

Understanding Specific Areas of Risk

Bribery can be a risk in many areas of the construction industry:

Facilitation Payments – small payments or gifts made to speed up or “facilitate” actions that officials already are duty-bound to perform. We will not make facilitation payments. There is one exception, where a payment is being extorted from an employee and they feel that their safety, or that of their family, is at risk then they should make the payment. In these circumstances the company is duty bound to support the employee. The payment must then be reported directly to their line manager or via the HR Department.

Reciprocal Agreements – We will not participate in any form of collusion and we will not accept improper payments to obtain new business, retain existing business, or secure improper advantage.

False Claims – we will never participate in the falsification of any claims.

Corrupt third parties – We look to work with those who are willing to work to the conditions set out within our policy. Payments made to third parties should be properly authorised and recorded.

Gifts and hospitality – Gifts and hospitality may be offered or accepted provided they conform to the policy principles which are:

- They are modest and appropriate in the circumstances
- They are made in good faith and are not intended to advantage the individual making the offer
- They are not intended to induce improper conduct

If an employee is in any doubt regarding a gift or hospitality, they must discuss it with the Head of Department or a Director.

If an employee is offered a gift or hospitality and refuses it because of its value, or has doubts about the intention behind such offer, then they must report this to the Head of Department or a Director.

Employees must not organise any hospitality event without seeking authority from a Head of Department or a Director.

If a gift or hospitality is offered to a third party and refused this must also be reported to the Head of Department or a Director.

Financial record keeping – we will ensure that our financial records are accurate and complete.

Consequences of engaging in bribery and corruption

Under the Bribery Act 2010, individuals and companies can face fines and even imprisonment if found to be engaging in bribery or corruption and it is a criminal offence for a company to fail to prevent bribery committed on its behalf. We take this responsibility very seriously and we only want to be associated with others whose standards match our own.

A conviction for a bribery or corruption related offence would have severe penalties for our reputation. This could lead to us being excluded from tender lists, leading to loss of business.

Arrangements

We will:

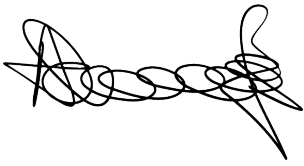
- Comply with this Anti-Bribery and Corruption Policy and the Bribery Act 2010
- Maintain company visions and values of openness and honesty.
- Record all activities and transactions accurately.
- Never participate in any form of corrupt behaviour
- Never use company funds, in the form of payments or gifts and hospitality for any unlawful, unethical or improper purpose.
- Never offer or give anything of value to a public official or their representative to induce or reward them for

acting improperly in the course of their public responsibilities.

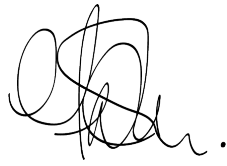
- Never offer or accept gifts or hospitality if we think this might impair objective judgement, improperly influence a decision or create a sense of obligation, or if there is a risk it could be misconstrued or misinterpreted by others.

If an employee is concerned that acts of bribery are occurring in the organisation, they should inform their Head of Department in the first instance. If this course of action is inappropriate, the employee should inform another senior manager, Director or the HR Department.

Signed



Adam Knaggs
Managing Director



Francis Shiner
Chairman



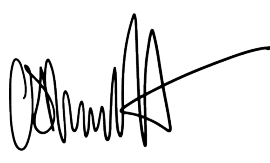
Gary Wykes
Director



Andrew Mitchell
Finance Director



Andrew Shiner
Director



Carl Bennett
Director



Dan Changer
Director



Jonathan Richardson
Finance Director

Sept 2024