

Anti-corruption and Bribery Policy.

Langstone Construction Group is committed to conducting all of 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.

If you breach this policy you will face disciplinary action, which could result in dismissal for gross misconduct. Any non-employee who breaches this policy may have their contract terminated with immediate effect.

This policy outlines the organisation's position on preventing and prohibiting bribery, in accordance with the Bribery Act 2010. It applies to all employees, officers, consultants, contractors, volunteers, work experience interns, casual workers and agency workers.

Definition

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.

What is prohibited?

The organisation prohibits you from offering, promising, giving, soliciting or accepting any bribe.

The following behaviour is unacceptable, and must not occur in this organisation:

- 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; and
- offering any financial or other reward from any person in return for providing some favour.

Business gifts and hospitality

From time to time, customers, suppliers or other persons might offer a gift to you. This could be a small item, or something of considerable value. The organisation may also offer small

gifts to customers, suppliers and other persons. If a gift is authorised by the organisation, you are entitled to give it to the appropriate individuals.

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.

All gifts, however small, must be reported to management and recorded. Permission must be given by the organisation before you offer or accept any hospitality invitation. A gift or hospitality will not be 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).

This policy does not prohibit the giving or accepting of reasonable and appropriate gifts or hospitality for legitimate purposes such as building relationships, maintaining our image or reputation, or marketing our products and services.

Responsibilities of management

Managers are responsible for keeping a record of all gifts and hospitality that are offered and/or received by employees working in their area of responsibility. If a manager is concerned about any actions, they should contact a director immediately for advice.

The organisation is responsible for ensuring that all staff (which may include consultants, contractors and agency workers) are aware of this policy, and fully understand the rules in relation to the acceptance of gifts and hospitality.

Donations to organisations

The organisation may make donations to charity. These are managed by Board. You should not make donations to a charity without approval of the Board.

No donations should be made to charities, political parties or other organisations with the intention of gaining a business advantage.

Disciplinary action

If an employee is found to have offered or accepted a bribe they will face disciplinary action which could include dismissal for gross misconduct.

Raising concerns

If you are concerned that acts of bribery or corruption are occurring in the organisation, are offered a bribe, or are asked to make one, you should inform your line manager in the first instance. If this course of action is inappropriate, you should report it in accordance with our Whistleblowing Policy as soon as possible.

When you report suspected instances of bribery, the organisation will process any personal data collected in accordance with its Data Protection Policy. Data collected from the point at

which you make the report is held securely and accessed by, and disclosed to, individuals only for the purposes of dealing with the report of bribery.

This policy is not contractual and may be varied by the organisation at any time.

A handwritten signature in blue ink, appearing to read "N. Phillipott".

Neil Phillipott
Langstone Construction Group Ltd
April 2025