



## ANTI-BRIBERY POLICY

Anglian Excavations Limited is committed to conducting business in an ethical and honest manner, and is committed to implementing and enforcing systems that ensure bribery is prevented. We have zero tolerance to bribery and corrupt activities, and recognise that, under the Bribery Act 2010, punishment may comprise up to ten years in prison and an unlimited fine.

This policy applies to all employees. Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law. Bribery is illegal, and refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting or soliciting something of value or of an advantage so as to induce or influence an action or decision.

The company accepts normal and appropriate gestures of hospitality and goodwill so long as the giving or receiving of gifts meets the following requirements:

- It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits.
- It is not made with the suggestion that a return favour is expected.
- It is given in the name of the company, not in the individual's name.
- It does not include cash, or a cash equivalent.
- It is appropriate for the circumstances, and never in excess of £100 in value.
- It is given openly, not secretly.

As good practice, gifts given and received should always be disclosed to the CEO, as Compliance Manager. The company does not allow kickbacks to be made or accepted. It recognises that kickbacks are typically made in exchange for a business favour or advantage.

If an employee suspects that there is an instance of bribery or corrupt activity, they are encouraged to raise their concerns at an early stage. The Compliance Manager will familiarise all employees with its whistleblowing policy below so that they can voice these concerns swiftly and confidentially.

If an employee refuses to accept or offer a bribe, or reports a concern relating to potential acts of bribery or corruption, the company understands that they may feel worried about potential repercussions. The company declares that it will support anyone who raises concerns in good faith under this policy, even if investigation finds that they were mistaken. The company will ensure that no-one suffers any detrimental treatment as a result of refusing to accept or offer a bribe or other corrupt activities or because they reported a concern relating to potential acts of bribery or corruption.

This policy does not form part of an employee's contract of employment and may be amended at any time to improve its effectiveness at combatting bribery or corruption. However any employee found to have breached or to not act in accordance with this policy will face action in line with the Company Disciplinary Procedure.

**Signed:**

A handwritten signature in blue ink, appearing to be 'Chris Lee', written over a horizontal line.

Chris Lee

**Position:** Chief Executive Officer

**Date:** January 2024