

Purpose

The purpose of this policy is to establish controls to ensure compliance with all applicable bribery act regulations, and to ensure our business is conducted in a socially responsible manner.

Policy Statement

It is our policy to conduct 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 dealings wherever we operate. We are also committed to implementing and enforcing effective systems to counter bribery. This policy applies to all individuals working at all levels and grades, including senior managers, directors, employees (whether permanent, fixed term or temporary). Although we cannot control other stakeholders' approach, we positively encourage similar behavior with the consultants, contractors, and any other person providing services to us. We will uphold all law relevant to countering bribery and corruption in all the jurisdictions in which we operate. However, we remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct.

What is a bribe?

A bribe is a financial or other advantage offered, promised, given, requested, agreed to, received, or accepted:

- To anyone to persuade them to or reward them for performing their duties improperly or.
- To any public official with the intention of influencing the official in the performance of his duties.

* Please note Hospitality is not prohibited by the Bribery Act

- Facilitation payments are bribes under the Act

This policy covers:

- Bribes
- Gifts and hospitality
- Facilitation payments and kickbacks
- Donations Bribes

Employees must not engage in any form of facilitation payments (bribes), either directly or through any third party.

Gifts and Hospitality

Compliance with the Policy does not mean that Coltarts cannot entertain its customers, suppliers, and partners to get to know them better in the ordinary course of business. It means that entertainment needs to be appropriate and relevant.

Similarly, gifts may still be given or received where custom dictates; however, they should be at an appropriate level. When giving or receiving gifts or entertainment, it must be done without the intention of the recipient then being subjected to improper influence by a provider.

In certain circumstances gifts and hospitality may amount to bribery and all employees must comply strictly with Coltart Contracts Ltd's ethics policy in respect of gifts and hospitality.

We will not provide gifts or hospitality with the intention of persuading anyone to act improperly or to influence a public official in the performance of his duties.

Facilitation Payments and Kickbacks

We do not make, and will not accept, facilitation payments or "kickbacks" of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. Kickbacks are typically payments made in return for a business favour or advantage. All employees must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.

Donations

Charitable support and donations are acceptable (and indeed are encouraged). However, employees must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery. We only make charitable donations that are legal and ethical and not to gain any commercial advantage.

Record Keeping

We will keep financial records and have appropriate internal controls in place which will evidence the business reason for making any payments to third parties. All expense claims relating to hospitality, gifts or expenses incurred to third parties must be submitted in accordance with our expenses policy and specifically records the reason for the expenditure. All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers, and business contacts, must be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

Raising Concerns

Employees will be encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. No employee will suffer any detriment as a result of raising genuine concerns about bribery, even if they turn out to be mistaken. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries or concerns, these should be raised with your line manager or a director.

Training and Communication

Training on this policy forms part of the induction process for all new employees. All existing employees receive regular, relevant training on how to adhere to this policy.

Audit and Review

The Board will regularly review the effectiveness of this policy. Internal control systems and procedures will be subject to audit under the internal audit process.



Bryan McPike
Joint Managing Director



Phyllis Carroll
Joint Managing Director

Approved and Signed 30th April 2025