Public			
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Anti-bribery & Corruption policy

Definition

Corruption is the misuse of office or power for gain. Bribery is a form of corruption which means in the course of business giving or receiving money, gifts, meals, entertainment or anything else of value as an inducement to a person to do something which is dishonest or illegal.

The Company prohibits any form of bribery or corruption. We require compliance from everyone connected with our business, with the highest ethical standards and in accordance with anti-bribery and competition laws. Integrity and transparency are of utmost importance to us and we have a zero tolerance attitude towards corrupt activities of any kind, whether committed by Erith Group employees or by third parties acting for or on behalf of the Erith Group

Purpose

The purpose of this policy is to convey to all employees and interested parties of the Erith Group the rules of the Company in relation to our unequivocal stance towards the eradication of bribery and corruption and our commitment to ensuring that the Erith Group conducts its business in a fair, professional, and legal manner.

Offences

Under the bribery Act 2010, it is an offence to:

- offer a bribe.
- accept a bribe.
- bribe a foreign official.
- as a commercial organisation, to fail to prevent a bribe.

We also acknowledge our responsibility under competition law not to engage in any anti- competitive arrangements (whether orally or in writing) where the intention or the effect is in some way to restrict, prevent or distort competition, through collusive tendering in bid competitions. This includes:

- 'Cover pricing' where one bidder suggests a price for another bidder to return.
- Any other agreement amongst competitors to fix the prices including the prices paid to suppliers.
- Any agreement between competitors that involves deciding which competitor will win a particular contract or dividing up the business so that only some tenderers will bid for work in a particular area or of a particular type.

You should be aware that a breach of bribery or competition law is a criminal offence, and you could be prosecuted, face prison and or receive an unlimited fine. The Company could also face prosecution and be liable to pay a fine.

Scope

This policy applies to all employees of the Erith Group, regardless of seniority. It also extends to anyone working for or on our behalf e.g. those engaged by us on a self- employed basis, contractor or an agency arrangement.

Policy

It is prohibited, directly or indirectly, to offer, give, request or accept any bribe i.e. gift, loan, payment, reward or advantage, either in cash or any other form of inducement, to or from any person or company in order to gain commercial, contractual or regulatory advantage for the Company, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.

It is also prohibited to act in the above manner to influence an individual in his capacity as a foreign public official. You should not make a payment to a third party on behalf of a foreign public official.
If you are offered a bribe, or a bribe is solicited from you, you should not agree to it unless your immediate safety is in jeopardy. You should immediately contact the Erith Group Compliance Manager, email: compliance@erith.com, so that action can be taken if considered necessary. You may be asked to give a written account of events.

If you, as an employee or person working on our behalf, suspect that an act of bribery, or attempted bribery, has taken place, even if you are not personally involved, you are expected to report this to the Erith Group Compliance Manager, email: compliance@erith.com. You may be asked to give a written account of events.

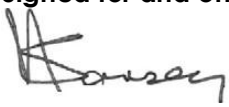
Appropriate checks will be made before engaging with suppliers or other third parties of any kind to reduce the risk of our business partners breaching anti-bribery or competition law rules.

The Company will ensure that all its transactions, including any sponsorship or donations given to charity, are made transparently and legitimately.

The Erith Group takes any actual or suspected breach of this policy extremely seriously and will carry out a thorough investigation should any instances arise.

We will uphold bribery and competition laws and will take disciplinary action against any employee, or other relevant action against persons working on our behalf or in connection with us, should we find any potential breach. This action may result in your dismissal if you are an employee, or the cessation of our arrangement with you if you are self-employed, an agency worker, contractor etc.

Signed for and on behalf of the Executive Board



Steven Darsey
Company Chairman
25/09/2026