

Anti-Bribery Policy

Introduction

The good reputation that our company enjoys is a hard won asset and one which we must strive to retain and protect at all times, this means all of us acting with the highest personal, ethical and corporate standards in everything we do.

Claret Civil Engineering has a number of fundamental principles and values which it believes are the foundation of sound and fair business practise and as such are important to uphold. One such principle is a zero-tolerance position in relation to bribery and corruption.

Following the introduction of The Bribery Act 2010, under UK law it is a criminal offence to offer, promise, provide, request or accept a bribe. It is also an offence for a commercial organisation to fail to properly prevent an incident of bribery committed by the company or by someone acting on its behalf in order to obtain or retain a business relationship or gain a business advantage.

This policy establishes our anti-bribery and corruption stance and explains what is expected of employees of the company. We also rely from time to time on the services of temporary staff, sub-contractors, agents and consultants and here we only want to do business with those organisations who accept the terms of our policy or whose own policy sets out standards of a similar nature to our own.

Recognising Bribery

Bribery can occur in many forms, so understanding them and recognising when they might occur is a primary step in guarding against it. Bribery is when a financial or other advantage is offered, given or promised to another person with the intention to induce or reward them or another person to perform their responsibilities or duties improperly or inappropriately.

It does not matter whether the bribe is given or received directly or through a third party (such as someone acting on behalf of Claret Civil Engineering for example a sub-contractor, agent, consultant, supplier or other intermediary) or whether the bribe is for the benefit of the recipient or some other party.

Policy

This policy applies to individual employees, temporary staff, sub-contractors, agents, consultants, suppliers or other intermediaries that may represent or be associated with Claret Civil Engineering.

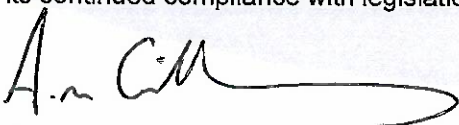
It is prohibited for any form of bribe to be promised, paid to, requested or accepted from clients, suppliers, local authority, council and government representatives, private persons or company.

This policy does not prohibit the giving or receiving of gifts or bona fide business hospitality providing that it is for a genuine purpose, reasonable and proportionate to the ordinary course of business, customary in a particular market or they constitute a ceremonial gift on a festival, event or at any other special time.

If any employee is in doubt as to whether a potential act constitutes an act of bribery, they should refer the matter to their immediate supervisor, manager or to a director. The prevention, detection and reporting of bribery and corruption is the responsibility of all employees throughout Claret Civil Engineering, therefore suitable channels of communication will be maintained pursuant with the company's Whistleblowing policy for suspicions of bribery to be reported.

Any breach of this policy, whether or not intentional, will result in prompt disciplinary action being taken, up to and including dismissal.

This policy will be issued to all employees and other stakeholders and will be reviewed annually to ensure its continued compliance with legislation and sustained relevancy to the company's business activities.



A R Gibbons
Managing Director

20th July 2021