

## ANTI-BRIBERY AND CORRUPTION POLICY

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Signed |



Padraig Burke [Director]

Dated | 4<sup>th</sup> October 2021

Ward & Burke (Ward & Burke Group Ltd. and Ward & Burke Construction Ltd.) is committed to the highest standard of ethical conduct and integrity. It recognises that giving or receiving bribes is contrary to the Bribery Act 2010 [the Act]. The policy sets up Ward & Burke's position on preventing and prohibiting bribery and corruption. This policy also applies to Ward & Burke's supply chain and partners including agents, advisors, consultants, and subcontractors.

To achieve this, Ward & Burke will;

- Carry out business fairly, honestly, and openly;
- Not offer money, Gifts, hospitality, or other advantages to any person carrying out a business or public role, or any associate in order to get them to undertake something improper;
- Prohibit its employees, officers, and directors from offering, making or paying any facilitation payments to anyone including but not limited to foreign public officials, with the intention of influencing them to our business advantage;
- Any employee found to be in breach of these principals will face disciplinary actions according to our disciplinary procedure
- Require every employee including Directors to declare any benefits they are offered or accepted to their line managers;
- Avoid doing business with others who do not commit to conducting business without bribery

No employee will suffer demotion, penalty, or other adverse consequence for refusing to pay or accept bribes even if it may result in Ward & Burke losing business.

The Act guiding this policy exists based on a framework of five criminal offences which include;

- Giving, promising, and offering of a bribe
- Agreeing to receive or accept a bribe
- Bribing a foreign official
- Failure of commercial organisations to prevent bribery
- A Senior Officer of a commercial organisation consenting to, or conniving in the act of bribery

Ward & Burke considers a breach of this policy as a serious offence. Any violation will result in disciplinary action, up to and including dismissal of an individual in appropriate circumstances.

### Review

Compliance with this policy by all will be reviewed annually to ensure it is suitable, effective, and consistently implemented.