

MILBANK

CONCRETE PRODUCTS

Milbank Concrete Products Ltd

ANTI-CORRUPTION & ANTI-BRIBERY POLICY STATEMENT

Purpose

It is the Company's policy to conduct all of its business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally and with integrity in all our business dealings and relationships wherever we operate.

The Company and any person acting on the Company's behalf shall not participate in any form of corrupt behaviour and shall comply with the Bribery Act 2010 and all other laws relevant to countering bribery and corruption.

Scope

This policy applies to all associated persons of the Company.

Associated persons include:

1. All employees of the Company. This applies to individuals working for the Company at all levels and all grades, whether permanent, fixed-terms or temporary and whether in paid employment or acting voluntarily.
2. All contractors, sub-contractors, consultants, joint-venture partners, agents, intermediaries and to any other person associated with the Company or acting on our behalf, and to all of their employees.
3. All directors of the Company; and
4. The Company's subsidiaries and their employees. This policy applies to all dealings you as an associated person have with any individual or organisation you come into contact with during the course of your work with us.

Your Responsibilities (extract from the Company Handbook)

You must ensure that you read and understand this policy and all related anti-corruption and anti-bribery policies and procedures as it is always your responsibility to comply with all such policies and procedures .

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for, or under the control of the Company. All associated persons are required to avoid any activity that might lead to, or suggest, any breach of the Company's anti-corruption and anti-bribery policies and procedures.

The Company will keep financial records and internal controls to evidence the business reason for making payments to or receiving payments from third parties. You will cooperate with the Company to ensure that all accounts, invoices, memoranda and other documents and records relating to dealing with third parties, such as clients, suppliers and business contacts, are prepared and maintained with strict accuracy and completeness.

It is important that you tell HR as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, are aware of bribery taking place, or believe that you are a victim of any other form of unlawful activity.

The Company's zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

All employees, workers and associated persons are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

Lee Cowen
Managing Director

Date: December 2023

