

1. Policy Statement

- 1.1 It is the policy of MD Developments & MD Scaffolding to conduct 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 business operations and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.
- 1.2 We will uphold all laws relevant to countering bribery and corruption, including the Bribery Act 2010, in respect of our conduct.
- 1.3 Bribery and corruption are punishable for individuals by up to ten years' imprisonment and if we are found to have taken part in corruption, we could face an unlimited fine and face damage to the Company reputation. We therefore take our legal responsibilities very seriously.

2. Scope

- 2.1 The purpose of this policy is to:
 - set out our responsibilities, and of those working for us, in observing and upholding our position on bribery and corruption; and
 - provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues.
- 2.2 This policy applies to all staff throughout the business operations and may include the following types of bribery and participants
 - Bribery of government officials
 - Commercial Bribery
 - Falsification of company books, training documentation and records
 - Charitable contributions
 - Money laundering
 - Travel & hospitality
 - Gifts and entertainment
 - Facilitation payments

3. Responsibilities

- 3.1 The Directors have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 3.2 Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

4. Your responsibilities

- 4.1 All staff are responsible for reading, understanding and complying with this policy.
- 4.2 The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. All staff are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 4.3 Any staff who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with other workers if they breach this policy.

5. What is bribery?

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

Examples:

Offering a bribe

You offer a potential client tickets to a major sporting event, but only if they agree to do business with us. This would be an offence as you are making the offer to gain a commercial and contractual

IMS Ref.	Version No	Dated	Approved By	Page No
MDPOL-01	6	1 st Oct 2024	A Malcoci	Page 1 of 3

advantage. We may also be found to have committed an offence because the offer has been made to obtain business for us. It may also be an offence for the potential client to accept your offer.

Receiving a bribe

A client offers money to the Company to influence an outcome. It is an offence for a client to make such an offer. It would be an offence for you to accept the offer as you would be accepting the bribe and committing fraud.

7. Gifts and hospitality

- 7.1 This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties.
- 7.2 Clients may offer small gifts, e.g. pens, diaries etc. these are not classified as a bribe

8. What is not acceptable?

- 8.1 It is not acceptable for the Company or individual to:
 - (a) give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
 - (b) accept payment from a third party that you know, or suspect is offered with the expectation that it will obtain a business advantage for them or alter the an outcome;
 - (c) engage in any activity that might lead to a breach of this policy.

9. How to raise a concern

- 9.1 You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage.
- 9.2 If you are offered a bribe by a third party, are asked to make one, or if you believe or suspect that any bribery, corruption or other breach of this policy has occurred or may occur, or believe that you are a victim of another form of unlawful activity you must speak to the Company Director.
- 9.3 If you are unsure whether a particular act constitutes bribery or corruption, you should speak to the Company Director.
- 9.4 If you have any other queries these should also be raised with the Company Director.

10. Whistle Blowing

The company does not tolerate any actions against employees who report infringements of any kind. The company encourages a 'speak up' culture to ensure the business is protected from bribery risks, and to allow action to be taken against those who do not act in accordance with the letter and spirit of this Policy.

11. Responding to Bribery

The company maintains a bribery response plan to deal with all actual and suspected instances of bribery.

The plan contemplates:

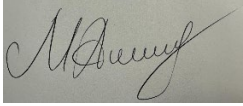
- The immediate suspension any related activities (e.g. a tender process).
- Informing appropriate internal personnel.
- Investigating and documenting the course and outcome of any investigations.

The Directors of MD Developments & MD Scaffolding are totally committed to this Policy and its implementation.

This Policy will be reviewed annually (or as and when required) by the MD.

IMS Ref.	Version No	Dated	Approved By	Page No
MDPOL-01	6	1 st Oct 2024	A Malcoci	Page 2 of 3

It is briefed and acknowledged by all employees on induction and following any policy changes.



Ms Arinna Malcoci
Director

Next Review Date: 01/10/2025

IMS Ref.	Version No	Dated	Approved By	Page No
MDPOL-01	6	1 st Oct 2024	A Malcoci	Page 3 of 3

(Uncontrolled when printed)