



Williams Construction (Stockport) Limited

Anti-Corruption and Bribery Policy

Introduction

Williams Construction (Stockport) Limited is committed to conducting business honestly without corrupt practices or acts of bribery, ensuring adherence to high legal and ethical standards. This must be reflected in every aspect of the way in which the company operates.

Bribery and corruption have a range of definitions in law, but the fundamental principles apply universally. Bribery is the offering, promising, giving, demanding or acceptance of an advantage as an inducement for an action which is illegal, unethical or a breach of trust. Corruption is the misuse of public office or power for private gain, or misuse of private power in relation to business. Acts of bribery or corruption are designed to influence the individual in the performance of their duty and to incline them to act dishonestly. Bribes can take on many different shapes and forms, but typically they involve corrupt intent. There will usually be a 'quid pro quo' – both parties will benefit. A bribe could be the:

- * direct or indirect promise, offering, authorisation or acceptance of anything of value
- * offer or receipt of any kickback, loan, fee, reward or other advantage
- * giving or receiving of aid, donations or voting designed to exert improper influence.

Williams Construction applies a “zero tolerance” approach to acts of bribery and corruption by any of our staff, consultants, subcontractors employed by us, suppliers etc. Any breach of this policy will be regarded as a serious matter and, for employees, is likely to result in disciplinary action.

The purpose of this policy is to set out the responsibilities of employees in observing and upholding our stance on bribery and corruption and to provide information and guidance to our employees on how to recognise and deal with bribery and corruption issues.

Policy

Risk Assessment

Effective risk assessment is at the very core of the success or failure of this policy. Risk identification pinpoints the specific areas in which bribery and corruption risks arise and enable better evaluation and mitigation of these risks.

The Company Director is required to consider bribery and corruption risk as part of their ongoing risk assessment procedures. We have provided causes for concerns/red flag risk factors to be considered when assessing the corruption and bribery risk faced by the company.

Monitoring and Record Keeping

Williams Construction will maintain an effective system of internal control and monitoring of our transactions. Once bribery and corruption risks have been identified and highlighted via the risk assessment process, procedures must be developed accordingly to mitigate these risks.

It is imperative that accurate books, records and financial reporting are kept. Overall financial reporting must be maintained and be transparent. False, misleading or inaccurate records of any kind could potentially damage the company.

Facilitation payments and kickbacks

In many countries, it is customary business practice to make payments or gifts of small value to government officials in order to speed up or facilitate a routine action or process. Despite this, facilitation payments as defined here are against this policy. Williams Construction takes the view that they are illegal. The UK Bribery Act 2010 makes no distinction between facilitation payments and bribes – regardless of size or local cultural expectations, even if that is “how business is done here”.

Gifts, Entertainment and Hospitality

This policy does not prohibit acceptable and appropriate hospitality (given or received) to or from third parties. It is not acceptable for you (or someone on your behalf) to:

- give, promise to give, or offer, a payment, gift or hospitality with the expectation that a business advantage will be received, or to reward a business advantage already given
- give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure
- 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
- accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return
- threaten or retaliate against another working on our behalf who has refused to commit a bribery offence or who has raised concerns under this policy,
- or engage in any activity that might lead to a breach of this policy.

Responsibilities

You must ensure that you read, understand and comply with this policy. The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working on our behalf.

All such parties are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must report any suspicion that a conflict with this policy has occurred, or may occur in the future as soon as possible.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct.

Training and communications

Williams Construction will communicate this policy and relevant guidance to all employees. Wherever possible we will also communicate this policy to our contractors, suppliers and wider stakeholders. All employees will be expected to take responsibility for ensuring that any consultants, contractors or anyone else acting on our behalf are made aware of this policy and our zero-tolerance approach to bribery and corruption.

Raising concerns

All those covered by this policy have a responsibility to help detect, prevent and report instances not only of bribery, but also of any other suspicious activity and wrongdoing. All initial concerns will be treated confidentially. However, as an investigation progresses it may not always be possible to fully protect the names of those raising concerns. Where this is a concern then the situation will be discussed with the people concerned before any action is taken. It is very important to us that any concerns about abuse of this policy are raised. Employees are encouraged to raise concerns about any instance of malpractice at the earliest possible stage to their Site Supervisor or Director. Victimising an employee for raising a legitimate concern will be a disciplinary offence as will maliciously or vexatiously raising a concern.

Responsibility, monitoring and review

Gareth Williams, Director has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that those under our control comply with it. He has primary and day-to-day responsibility for implementing this policy and for monitoring its use and effectiveness and dealing with any queries on its interpretation. Site Supervisors 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.

Williams Construction will periodically review the implementation of this policy in respect of its suitability, adequacy and effectiveness and make improvements as appropriate.

Instances to cause concerns / red flags

The following is a list of possible red flags that may arise during the course of employee operations and which may raise concerns under various anti-bribery and anti-corruption laws. The list is not intended to be exhaustive and is for illustrative purposes only.

If you encounter any of these red flags whilst carrying out your work duties, you must report them promptly to your Site Supervisor or Director, Gareth Williams.

- You become aware that a third party engages in, or has been accused of engaging in, improper business practices
- You learn that a third party has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a "special relationship" with foreign government officials
- A third party insists on receiving a commission or fee payment before committing to sign up to a contract with us, or carrying out a government function or process for us
- A third party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made
- A third party requests that payment is made to a country or geographic location different from where the third party resides or conducts business

- A third party requests an unexpected additional fee or commission to "facilitate" a service
- A third party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services
- A third party requests that a payment is made to "overlook" potential legal violations
- A third party requests that you provide employment or some other advantage to a friend or relative
- You receive an invoice from a third party that appears to be non-standard or customised
- A third party insists on the use of side letters or refuses to put terms agreed in writing
- You notice that we have been invoiced for a commission or fee payment that appears large given the service stated to have been provided
- A third party requests or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to us
- You are offered an unusually generous gift or offered lavish hospitality by a third party.



Date: 30.04.25

Gareth Williams

Director