

Anti-Bribery Policy

A) Introduction

Bribery is a criminal offence. The company prohibits any form of bribery. We require compliance from everyone connected with our business with the highest ethical standards and anti-bribery laws applicable. Integrity and transparency are of utmost importance to us as we have a zero-tolerance attitude towards corrupt activities of any kind, whether committed by employees or by third parties acting for or on behalf of the Company.

B) Policy

It is prohibited, directly or indirectly, for any employee or person working on our behalf to offer, give, request or accept any bribe i.e. gift, loan, payment, reward or advantage, either in cash or any other form of inducement, to or from any person or Company in order to gain commercial, contractual or regulatory advantage for the Company, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.

C) Suspicion

If we suspect that you have committed an act of bribery or attempted bribery, an investigation will be carried out and, in line with our disciplinary procedure, where appropriate, action may be taken against you, which may result in your dismissal or the cessation of our business arrangement with you.

D) Reporting

Employees are strongly encouraged to report any suspicions regarding bribery or corruption through a secure and confidential reporting system. All reports are met with a prompt and thorough investigation led by Company director, ensuring that appropriate remedial actions are taken when necessary.

E) Gifts and Hospitality

We realise that the giving and receiving of gifts and hospitality as a reflection or friendship or appreciation, where nothing is expected in return, may occur, or even be

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commonplace, in our industry. This does not constitute bribery where it is proportionate and recorded properly

F) Record Keeping

A record will be made by the Line Director of every instance in which gifts or hospitality are given or received.

No gifts should be given, nor hospitality offered by an Employee or anyone working on our behalf in connection with our business without receiving prior agreement from the Managing Director.

Similarly, no gift or offer or hospitality should be accepted by an employee or anyone working on our behalf without receiving prior agreement from the Managing Director.

As an organisation, Bagnall's engages in regular reviews of its internal policies and operational processes to guarantee full alignment with the Bribery Act 2010. This includes updating training initiatives to stay current with legislative changes and ensuring that all employees are equipped with the necessary knowledge to recognize and avoid bribery-related issues.

The organisation has established a robust compliance framework that includes training sessions for employees, comprehensive anti-bribery policies, and implemented monitoring systems designed to detect and prevent violations before they occur.

A designated compliance officer (Company MD – Gavin Walker) is available for employees seeking guidance or wishing to voice concerns about suspicions of bribery or corruption. This officer is tasked with overseeing investigations and ensures that any allegations are handled with utmost confidentiality and seriousness.

The organisation is committed to strictly adhering to competition laws, which includes providing training for employees on legal obligations and actively monitoring business practices to mitigate the risk of anti-competitive behaviour.

Periodic audits and assessments are conducted to proactively identify any potential anti-competitive practices. By fostering a culture of compliance and ethical conduct, the organisation encourages employees to act in accordance with both legal standards and ethical expectations.

Suppliers are required to furnish a detailed statement outlining how they ensure compliance with anti-bribery and corruption legislation. This includes descriptions of their internal policies and training programs aimed at preventing bribery.

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Suppliers must affirm their commitment to competition law and describe the measures they have established to avoid anti-competitive behaviour within their operations.

Suppliers should articulate the specific arrangements they have implemented to both detect and prevent anti-competitive practices, demonstrating their commitment to ethical business conduct.

Suppliers are expected to outline their processes for reporting and investigating any potential acts of bribery, corruption, or anti-competitive behaviour, thus ensuring transparency and accountability in their operations.

Once a supplier has satisfied the requirements, they can then be added to the companies approved supplier list.

Staff are reminded of the Company's Whistleblowing Policy, which is available in the Employee Handbook

As the law is constantly changing, this policy is subject to review and the company reserves the right to amend this policy without prior notice.

Revised 15.07.23

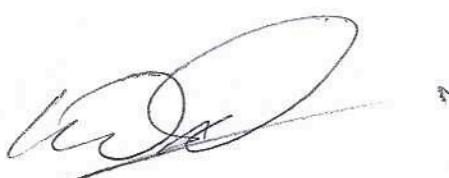
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Gavin Walker



Managing Director

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