

## ANTI CORRUPTION POLICY AND THE BRIBERY ACT 2010

### Introduction

This document has been introduced to outline the Jones Bros Ruthin (Civil Engineering) Co Ltd policy, practices and procedures to be followed in order to comply with section 7 of the Bribery Act 2010.

- It is an offence under section 7 for a "relevant commercial organisation" such as Jones Bros Ruthin (Civil Engineering) Co Ltd to fail to prevent bribery. In this context it is liable if a person associated with it (director, sub-contractor, employee, agent etc), commits or is in any way involved in an act of bribery, whether that person is prosecuted or not.
- It is, however, a defence against any such criminal allegation to show, on a balance of probabilities, that the organization nevertheless had adequate procedures in place to prevent persons associated with it from bribing.
- This policy describes the measures Jones Bros Ruthin (Civil Engineering) Co Ltd has adopted and put into place. It applies to all acts done by or on behalf of the Company.

### Policy

Jones Bros Ruthin (Civil Engineering) Co Ltd is committed to running a professional business free from discreditable behaviour of any kind. It is committed to the prevention of bribery by any and all persons associated with it.

In order to prevent the unwitting engagement in behaviour which might raise the suspicion of bribery and to prevent any associated person purporting to act on its behalf in a manner that brings suspicion on the Company and its employees, the following measures have been adopted as appropriate and proportionate to the risks it faces. They will be supported by regular training and disciplinary measures where necessary.

### Management

The responsibility for compliance with this policy rests with the board and its senior managers, who will exercise oversight, make assessments of risk, make decisions where potential for bribery exists, receive and investigate reports of bribery and supervise the measures put in place to prevent bribery.

The daily overall responsibility for the compliance with the Bribery Act and the implementation of the policy rests with the Compliance Officer - Director (presently the Group Finance Director Jane Griffiths). They are to be consulted on any matter where the possibility of unlawful acts could arise.

It shall be a condition of the contract of employment of all employees that they shall at all times observe the requirements of this policy.

The management and employees shall report any attempt at bribery which comes to their attention, whether it consists of an approach to one of them or an act done by a fellow employee or an associated third party. In the first instance the report should be made to the Compliance Officer, a Director of the Company or the Human Resource Manager. Under no circumstances should a person who reports a suspicion of bribery be subject to victimisation for making a bona fide report, whether or not the suspicion turns out to be justified. Where appropriate, the police shall be informed in the case of a serious breach of the Bribery Act 2010.

### **Assessment of Risk**

The Compliance Officer will require members of the management team (and any other members of staff) as he/she feels appropriate to assist in identifying areas where the risk of bribery might be present.

The results of these assessments will be recorded and, where considered necessary, specific procedures will be introduced to cover the areas of the business where risk of bribery is considered high.

Serious consideration must be given to the following circumstances:

- On occasions where hospitality is offered or accepted by managers or employees, issues may arise as to the line between a proper public relations exercise and an intention to induce improper performance of a relevant function.
- In relation to awarding of contracts to subcontractors or suppliers, competitive tendering reflecting specialism, price and quality should be in place. The Company's procedures require additional management approval where such contracts are not awarded to the lowest tender or where competitive tendering is not adopted.
- In relation to charitable and political donations, care should be exercised to avoid the suggestion of soliciting favours.

The assessment of the firm's exposure to external and internal risks of bribery will be assessed bi-annually by the Compliance Officer and documented by the Compliance Officer in a report to the Board of Directors.

### **Hospitality**

In relation to hospitality, promotional expenditure which seeks to improve the image of the firm, to establish cordial and professional relationships and to maintain them is not unlawful if it is reasonable and proportional.

In order to make an assessment of any particular hospitality event which is to be offered to a client or prospective client the Compliance Officer will have to be supplied with information. This will include the cost and nature of the hospitality, the name and details of the person to be entertained and the purpose of the event. He/she will be required to approve the event or make suggestions for modifying it.

In the event that a Director or employee is invited to an event, a similar procedure will be followed.

### **Contracts with Clients**

No fees over and above proper/commercial/professional fees, agreed in advance and documented, for any professional work, services or materials may be accepted. No payment or incentive of any kind may be made to the client for the award of a contract for goods or services. These rules will be vigorously imposed and are to be followed to the letter.

### **Subcontracting**

In subcontracting professional work to agents, no fee should be sought or accepted for awarding a contract to a subcontractor. This specifically includes payment, incentives or other rewards from organisations or individuals wishing to sell consumable goods or any other equipment or services required by the Company's operations.

### **Third Parties**

Any third party should be engaged to act on behalf of the Company in a manner consistent with this policy. The terms of engagement should be written down and refer to this policy. Jones Bros Ruthin (Civil Engineering) Co Ltd should carry out due diligence checks on prospective contractors. The checks should include where appropriate an assessment of their ethical conduct.

### **Charitable and Political Donations**

Donations of a charitable or political nature must be approved by members of the board and be subject to a prior audit to ensure that there can be no suspicion that any advantage could be thought to accrue to the firm or any of its partners or employees. A summary of all such payments will be submitted to the board at least twice annually.

### **Monitoring**

The Company reserves the right to monitor compliance with this policy at any time and in a manner it deems appropriate, at its sole discretion. Monitoring may take any form; including interviewing staff, analysing documentation, assessing contracts, evaluating costs, discussions with third parties etc. It will also, specifically, include thoroughly investigating all cases where bribery is suspected.

### **Review and Amendments**

The guidance issued under Section 9 of the Bribery Act was taken into account when drafting this policy. The Company will keep this policy under annual review and make amendments to it as appropriate and in the light of further guidance issued under section 9 of the Bribery Act. Any changes made will be communicated to all Jones Bros Ruthin (Civil Engineering) Co Ltd employees.



John Dielhof  
Managing Director  
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