

ANTI-BRIBERY AND CORRUPTION POLICY



1. Objectives

The aim of the Blackwood Plant Hire Ltd. (BPH) Anti-Bribery Policy is to set out our business practice and approach for countering bribery. The Anti-Bribery Policy will be supplemented by additional guidance on specific bribery risks, including a Code of Conduct which provide clear and unambiguous guidance on bribery risks, based upon a detailed bribery risk assessment.

2. Our approach

We take a zero-tolerance approach to bribery and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective procedures to counter bribery.

Employees are required not to put themselves in any position which might lead to, or suggest, a conflict of interest. Employees are also required not to engage in any form of otherwise unethical or unlawful behaviour.

Certain conduct is automatically prohibited. Prohibited conduct includes facilitation payments, kickbacks and payments to Public and Private sector officials.

Other conduct such as the giving or receiving of any advantage (whether pecuniary, financial or otherwise) such as a gift; invitation; entertainment or hospitality may be permissible depending on the circumstances.

Any offer of a bribe must be refused and reported internally immediately. Where appropriate, any bribe will also be reported to the police and/or regulatory authorities.

3. Scope

The Anti-Bribery Policy applies to all business practices and conduct. The Anti-Bribery Policy applies to all employees (staff, contract and temporary), third parties and associated persons acting on our behalf.

4. Communication of policy

All employees must ensure that they read, understand and comply with the Anti- Bribery Policy. The Anti-Bribery Policy, together with and any prevailing Code of Conduct which supports the Anti-Bribery Policy, will be communicated to third parties and incorporated into contractual dealings.

5. Personal commitments

Employees are required to avoid any activity that might lead to, or suggest, a breach of the Anti-Bribery Policy. Employees, third parties and associates are encouraged to raise concerns about any issue or suspicion of malpractice within the scope of the Anti-Bribery Policy at the earliest possible stage. For example, if a customer, distributor or potential supplier offers something to gain an advantage with us, or indicates that a gift or payment is required to secure their business. Employees who are unsure whether a particular act might constitute bribery, or have any other queries, should raise a query immediately with a line manager or any Company Director Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct.

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6. Record-keeping

We must keep financial records and have appropriate internal controls in place which will evidence the business reason and justification for any form of advantage received from or made to any third party.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments or any form of advantage.

7. Responsibilities

The Board of directors has overall responsibility for general oversight including;

- Ensuring the Anti-Bribery Policy and procedures are adequate and otherwise comply with our legal and ethical obligations;
- That all those under our control comply with it;
- Ensuring that the effectiveness of the Anti-Bribery Policy is monitored.
- Periodically reviewing the Anti-Bribery Policy.

Company Directors shall have the day-to-day responsibility for implementing the Anti-Bribery Policy. The Internal Audit function shall be responsible for monitoring the use and effectiveness of the Anti-Bribery Policy.

Line managers are responsible for receiving suspicious activity reports from employees and third parties, promptly passing any such reports to Department Heads and co-operating with any internal or external investigation.

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.

Employees are responsible for the prevention, detection and reporting of bribery and other forms of corruption and for honouring the personal commitments at section 6 of the Anti-Bribery Policy.

8. Protections

Employees who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

BPH is committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the HR department immediately.

If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found in the Employee Handbook.

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9. Implementation

It is every employee's responsibility to counter bribery in our business practices by adhering to the Anti-Bribery Policy. Department Heads are responsible for ensuring and all members of staff within their department receive relevant training. All new employees will be briefed as a part of the induction/welcome orientation.

It is the responsibility of every manager to communicate this policy and ensure that all employees and third parties, within their area of responsibility, understand and comply with the objectives.

10. Sanctions

Any violation of the Anti-Bribery Policy is a cause for disciplinary action, and could lead to dismissal for gross misconduct

No employee will be penalised, or be subject to other adverse consequences for refusing to pay bribes even if it may result in losing business.

BPH reserves the right to terminate our contractual relationship with third parties if they breach this policy. We will in any event, report any suspicion of unlawful activity to the regulatory authorities.

11. Tax Treatment

The acceptance and giving of invitations or gifts may have tax consequences for employees, recipients and/or the employers. The use and concession of discounts and other price advantages based on contracts or agreements that the company has entered into may likewise trigger tax consequences.

Employees, third parties and associates must ensure compliance with the prevailing tax regulations on the treatment of accepted and given invitations or gifts and non-monetary benefits. Tax advice shall be obtained to the extent necessary.

12. Other matters

Any act of bribery may also amount to an offence under the Fraud Act 2006. For example, falsifying documents or making false statements could amount to fraud by false representation where there is dishonest intent to make a gain on the part of an individual or another, or to cause loss to another or to expose another to a risk of loss.

Signed:

A handwritten signature in black ink, appearing to read 'P. McCormack'.

P McCormack
Managing Director

12 April 2021