

Anti-bribery and corruption policy & procedures



1. Objectives

The aims of Blackwood Plant Hire Ltd.'s Anti-Bribery and Corruption Policy are to outline our business practices and risk management approach to countering bribery and corruption. The Anti-Bribery & Corruption Policy will be supplemented by additional guidance on specific bribery and risks, including a Code of Conduct which provides clear and unambiguous guidance on bribery and corruption risks, based upon a detailed anti-bribery and corruption risk assessment. This anti bribery and Corruption Policy and procedures document will be reviewed at least annually or when a risk event has transpired.

2. Our process approach (Governance)

In compliance with The Bribery Act 2010: All forms of Bribery and Corruption are prohibited. 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 implementing and enforcing adequate and effective procedures, based on risk, 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. The Managing Director must first sanction this in all circumstances.

Any offer of a bribe must be refused and reported internally immediately to The MD or Operations Director. 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), agents, third parties and associated persons acting on our behalf.

4. Communication of policy

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

The policy is presented to employees at induction and is posted on Company Notice Boards to remind staff and employees of our anti – bribery and corruption requirements.

5. Personal commitments

Employees are required to avoid any activity that might lead to, or suggest, a breach of the Anti-Bribery and Corruption Policy. Employees, third parties and associates are encouraged to raise concerns about any issue or suspicion of fraud, anti-competitive behaviour, and/or 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, fraud, malpractice, 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.

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 and reporting suspicious activity reports from employees and third parties, promptly passing any such reports to the Managing Director or Operations Director 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.

All BPH staff and employees must read, understand and comply with this Anti-Bribery and Corruption Policy.

8. Mandatory requirements:

Directors, Managers and employees shall comply with all of the following mandatory requirements:

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- Never give or receive bribes. Any instance of anyone offering a bribe, for any reason must be reported to the MD immediately
- On the very small likelihood of any member of staff or an employee encountering a foreign or public official and/or any other associated official while working for BPH, they must never offer any bribes or accept any payments or favours to or from them.
- Directors, managers and employees are responsible for the prevention, detection and reporting of bribery and other forms of corruption and for honouring the personal commitments at section 7 of this Anti-Bribery Policy.
- All employees must abide with and comply with the BPH Anti-Bribery Policy and procedure.

To detect anti-competitive behaviour BPH shall implement a proactive approach that includes:

- Training at induction and regular refresher training to all personnel at risk.
- A strong internal reporting culture
- Understanding UK competition laws
- Reporting concerns when identified
- BPH will seek legal advice, whenever any doubts about compliance with this policy.

9. Protections

Employees who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about 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.

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 that 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.

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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 legal/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 and other legal consequences.

Employees, third parties and associates must ensure compliance with competition law and 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. Compliance with Anti-bribery and corruption laws are confirmed through our internal and external audit processes.

12. Other matters

Any act of bribery may also amount to an offence under the Economic Crime and Corporate Transparency Act.

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 "S. P. McCormack".

Stephen Paul McCormack
Managing Director

Dated: 09/06/2026