

Anti-Corruption & Bribery Policy Statement

PDR Construction Ltd (PDR) is a national construction company acting as Principal Contractor across a wide range on commercial and residential projects.

On 1st July, the UK Bribery Act 2010 (the “**Act**”) came into force. PDR is clear in its belief that corrupt acts are wrong under any circumstances; they expose PDR and its employees to the risk of prosecution, imprisonment and if we are found to have taken part in corruption, we could face unlimited fines, debarment from tendering for business and other penalties, and face damage to company’s reputation. We therefore take our legal responsibilities very seriously.

1. Policy Statement

- 1.1 It is our policy to conduct all our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption 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 systems to counter bribery.
- 1.2 The purpose of this policy is to publicly communicate to third parties our position on bribery and corruption. Workers should refer to our internal policy within the Staff Handbook.
- 1.3 In this policy, third party means any individual or organisation that comes into contact with us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

2. Who is covered by the policy?

- 2.1 Compliance with the Policy needs to be adhered to throughout the business; employees and business partners wherever they work, are expected and required to comply with this Policy. This includes:
 - (a) all individuals working at all levels, including partners, senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, homeworkers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, wherever located (collectively referred to as workers in this policy); and
 - (b) Third parties. Where we engage with third parties, we will undertake appropriate steps to ensure that they comply with the principles set out in this policy.

3. What are bribery and corruption?

Corruption is the misuse of office or power for private gain. A bribe is an inducement or reward offered, promised, or provided in order to gain any commercial, contractual, regulatory, or personal advantage.

4. Anti-Bribery Policy

The following Anti-Bribery Policy (the “Policy”) states our intentions and commitment to comply with the Act and to take every reasonable measure to operate and to carry out business in an open, honest, transparent, and fair manner. We will do this by:

- Complying with current legislation
- Adopting a zero-tolerance policy to bribery and corruption
- Training employees to ensure they understand the requirements of the UK Bribery Act 2010
- Ensuring that we have in place adequate procedures to prevent the risk of bribery and corruption within the company and among any of its customers, suppliers, and partners
- Ensuring that all necessary arrangements are in place to aid compliance and to investigate any reports made in accordance with the Policy
- Adopting the approach that it is better not to do business at all than to risk doing corrupt business
- Ensuring that no employee will suffer any adverse consequences as a result of reporting any suspicion of bribery or corruption
- Ensuring that everyone who is employed by, or performs services for or on behalf of, PDR in any capacity including agency workers and contractors are bound by the Policy. Intermediaries and other business partners are expected to act ethically and should be required to comply with the Policy in all their dealings with or for PDR.
- Monitoring the giving and receiving of gifts and entertainment and ensuring that approval procedures are understood and complied with
- Reviewing the Policy regularly to ensure its effectiveness, taking in to account any feedback and queries.

Compliance with the Policy does not mean that PDR cannot entertain its customers, suppliers and partners to get to know them better in the ordinary course of business. It means that entertainment needs to be appropriate and relevant.

Similarly, gifts may still be given or received where custom dictates, however they should be at an appropriate level. When giving or receiving gifts or entertainment, it must be done without the intention of the recipient then being subjected to improper influence by a provider.

Overall responsibility for this policy rests with the PDR Board of Directors. A copy of the full Anti-Bribery and Corruption Policy is available from the Financial Director and held on Union Square.

5. How to raise a concern

Third parties and Employees are encouraged in the first instance to raise with us any concerns about any issue or suspicion of malpractice at the earliest possible stage. Any concerns, or questions about this policy should be referred to Lee Newsham, Financial Director Office no. 01482 644444, or Email: lnewsham@pdrconstruction.co.uk. Additionally, matters of concern can also be escalated up to the Managing Director, if they feel it is appropriate to do so.

6. Monitoring and review

We will monitor and review the implementation of this policy, regularly considering its suitability, adequacy, and effectiveness.

Approved: *P. Dransfield*
Paul Dransfield [Managing Director]

Date: 18 . 9 . 20