

ANTI-BRIBERY & CORRUPTION POLICY

Introduction

Corruption and bribery are illegal and unethical. They destabilise communities, undermine the rule of law, and pose serious threats to sustained economic progress and the healthy operation of markets. Failure to address the risk of corruption and bribery may undermine our reputation and lead to investigations, fines and/or other penalties for the company and/ or individuals.

We do not engage in corruption, and we never pay bribes, regardless of local custom or practice. SJ Eastern's position on corruption is clear: the offer, payment, authorisation, solicitation and acceptance of bribes and other improper advantages is unacceptable.

This Corruption and Bribery Policy sets out SJ Eastern Carpentry & Joinery Ltd and SJ Eastern Fireproofing Ltd approach to the prevention of bribery and other forms of corruption.

Who does this apply to?

This policy applies to all directors, staff members, Construction Industry Scheme (CIS) staff, Agency's as well as Contractor's under SJ Eastern's direct supervision, working for SJ Eastern either at head office or on a clients/ main contractors' site.

What is a Bribe?

A bribe is an inducement or reward offered, promised, or provided in order to gain a commercial, contractual, regulatory, or personal advantage.

The Bribery Act 2010 contains two general offences covering the offering, promising, or giving of a bribe ("active" bribery) and the requesting, agreeing to receive, or accepting of a bribe ("passive" bribery). The Act also introduces a new form of corporate liability for failing to prevent bribery on behalf of a commercial organisation.

What is our Commitment?

We do not tolerate bribery of any kind, whether to a clients/ main contractors or a private individual.

We never offer, provide, or authorise bribes of any kind, including facilitation payments, either directly or indirectly, to a clients/ main contractor's or a private individual.

We never request or accept bribes of any kind, either directly or indirectly. A bribe may be monetary or non-monetary, tangible or intangible. A bribe may take the form of, or be facilitated through:

- Payments of money,
- Gifts or entertainment,
- Discounts, loans and/or financing given on non-commercial terms,
- Rebates or kickbacks in relation to services provided,
- Overpayments to business partners,
- Use of assets at a discount or free of charge,
- Sponsorships, charitable contributions, and community investments,
- Political contributions,
- Employment or internships or,
- Information or assistance.

To manage our bribery and corruption risk, we implement a range of procedures and controls relating to dealings with clients/ main contractor's, gifts and entertainment, our business partners, sponsorships and donations, political contributions and record keeping. We remain alert to corruption and bribery red flags and report them to Compliance.

Clients/ Main Contractor's

Dealing with clients/ main contractors brings a higher risk of corruption or the perception of corruption. We are especially careful when communicating with clients/ main contractor's, exchanging gifts and entertainment with clients/ main contractor's, or providing assistance to clients/ main contractors.

Facilitation Payments

In certain jurisdictions, clients/ main contractor's may request small payments, known as facilitation payments to expedite or to secure contracts prior to official appointment. Facilitation payments are a form of bribery. We never pay, or authorise the payment of, facilitation payments.

Payments made under Duress & Extortion

SJ Eastern prioritises the physical safety and well-being of all its staff members and contractors. If our welfare or safety is at risk, we take reasonable steps to remove ourselves from danger. In exceptional circumstances, this may include making a payment to a client/ Main Contractor to ensure our safety in the situation. We must report any such incident to the [Serious Fraud Office \(SFO\)](#) and inform NatWest to ensure corrective action takes place.

Gifts & Entertainment

The proper management of the giving and acceptance of gifts and entertainment is key to avoiding the risk they present of actual or perceived bribery or corruption.

We only give or accept gifts and entertainment that are:

- In good faith, occasional, reasonable, and appropriate
- A normal business courtesy, and
- Transparent.

We don't give or accept gifts and entertainment:

- With the intent or prospect of influencing decision-making or other conduct,
- With the intent obtaining any improper or undue advantage,
- Which are reasonably capable of being regarded in any way as a bribe, or
- In the form of cash, which includes pre-paid cards or gift cards which can be redeemed for cash.

Sponsorships, Charitable Contributions, & Community Investments

We never make a sponsorship, charitable contribution, or community investment in order to disguise a bribe, or to gain an improper business advantage. We ensure that before we enter into sponsorships, community investments or make charitable contributions we conduct risk-based due diligence. We monitor the appropriate use of our funds or resources when required.

Political Contributions

We do not seek to influence the political process by improper or corrupt means. To mitigate this risk, we do not contribute any funds or resources towards any political campaign, political party, political candidate or any politically affiliated organisation.

Business Partners & Supply Chain

We expect our business partners and supply chain to share our commitment to ethical and responsible business practices. We never authorise a business partner or one of our supply chain members to engage in bribery or corruption on our behalf. To manage our bribery and corruption exposure associated with our business partners and supply chain members, we implement a range of controls and processes including screening, due diligence, and monitoring, using a risk-based approach.

We implement additional controls with regards to high-risk business partners, and supply chain members, such as sub-contractors, manufacturers, agencies and consultants or advisers interacting with our clients/ main contractors on our behalf.

We conduct a detailed risk-based assessment prior to entering into these types of relationships, to enable us to identify, assess and mitigate the corruption risk presented by the engagements. Where appropriate, we also conduct ongoing monitoring and regular review of our high-risk business partner relationships.

Accurate Record Keeping

We ensure all transactions are accurately recorded in SJ Eastern's books and records in accordance with our procedures and reflect the nature and substance of the transaction.

Speaking Openly

We are each responsible for ensuring that we meet our commitments. SJ Eastern expects its staff members and contractors to speak openly and raise concerns about possible breaches of this policy with their manager, supervisor or via other available reporting channels. SJ Eastern takes concerns seriously and handles them promptly.

SJ Eastern has zero tolerance for retaliation against anyone who speaks openly about conduct they believe is unethical, illegal or not in line with our procedures and policies, even if the concern isn't substantiated, as long as they have not knowingly made a false report.

Consequences

Our policies support our beliefs and values and reflect what is important to us. We take breaches of our policies seriously. Depending on the severity of the breach, consequences may range from a warning to termination of employment.

In addition to internal reporting procedures, we are also committed to reporting any suspected breaches to the relevant authorities. This may include notifying law enforcement agencies or regulatory bodies, depending on the nature and severity of the suspected breach. It is important to note that the penalty for breach of the Bribery and Corruption Policy can be severe, with a potential penalty of up to 10 year's imprisonment, fines, and other penalties. We take this matter very seriously and will take all necessary steps to prevent and address any breaches of our policy, including reporting to the relevant authorities where necessary.

Key Terms	
Bribe	Anything of value, including any financial or other advantage, offered, provided, authorised, requested, or accepted. In order to improperly influence any person's action, inaction, or decision, whether the person is a client/ main contractor or a private individual.
Corruption	The abuse of power or position for personal gain.
Gifts	Any items of value or benefits exchanged at no cost.
Entertainment	Any activity offered or received for free - or at less than market price - including (but not limited to) meals, travel, accommodation, sporting events, recreational activities, and hospitality.
Facilitation Payment	Any payment, however small, to expedite or to secure the performance of a routine governmental action.
Main Contractor	Is a total responsible contractor for the completion of the project under the contract terms and conditions. The Main Contractor can utilise and manage subcontractors or hire people for specific parts of the work to complete the work.
Client	a person or organisation using the services of a lawyer or other professional person or company.

Additional Resources

- NatWest, Employment Law Handbook (PAYE). (Section Anti-Bribery and Corruption)
- Bribery Act 2010 Guidance - <https://www.gov.uk/government/publications/bribery-act-2010-guidance>