



Anti-bribery procedure

Purpose

The purpose of this policy is to set out the responsibilities of DKC Construction Limited in observing and upholding our position on bribery and corruption.

1. Scope

This policy applies to all employees (staff, contract, temporary). Where DKC Construction Limited have a minority interest, we will encourage the application of this policy amongst our business partners including contractors, suppliers, and any joint venture partners.

2. Responsibility

The Managing Director is the main board Director with primary responsibility for implementing this policy.

The Managing Director will regularly risk assess DKC Construction Limited's positions in relation to bribery through consideration of such matter as the location of where their business is taking place, their current commercial contracts, and Company expenditure.

It is the responsibility of all employees to prevent and report conduct which has taken place which you suspect is a bribe (or corrupt). Any such incidents can be reported to a Manger or the Managing Director by using the procedure set out below. Employees are encouraged to raise concerns about any instance of malpractice at the earliest possible stage through their Line Manager, but any employees who do raise concerns or suspicion of malpractice will not suffer any detriment as a result, even if they turn out to be mistaken.

3. Introduction

DKC Construction Limited's values its reputation for ethical behaviour and for financial integrity and reliability. It recognises that over and above the commission of any crime, any involvement in bribery will also reflect adversely on its image and reputation. Its aim therefore is to limit its exposure to bribery by:

- Setting out a clear anti-bribery policy;
- Encouraging its employees to be vigilant and to report any suspicion of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately;
- Requiring all employees to act honestly and with integrity at all times and to safeguard DKC Construction Limited resources as a whole brand for which they are responsible;
- Ensuring transactions are properly and accurately recorded;
- Rigorously investigating instances of alleged bribery and assisting the police and other appropriate authorities in any resultant prosecution;
- Taking firm and vigorous action against any individual(s) involved in bribery.



4. The Law

Under UK law (UK Bribery Act 2010), bribery and corruption are punishable for individuals by up to ten years imprisonment. If the company is found to have taken part in the corruption or lacks adequate procedures to prevent Bribery, it could face an unlimited fine and be excluded from tendering for Government contracts.

The key legislation and/or sources of Global Best practice that input into this policy are:

Bribery Act 2010

UK Fraud Act 2006

UK Anti-Terrorism, Crime & Security Act 2001

UK Corporate Governance Code (2010)

UK Money Laundering Regulations (2007)

UN Convention Against Corruption (2003)

Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (OECD)

Council of Europe Criminal Law Convention on Corruption (1998) and Additional Protocol (2005)

Competition Act 1998

5. Definitions

Fraud: international misrepresentation or concealment of the truth in order to secure something of value from another. The Fraud Act 2006 includes fraud by false representation, by failing to disclose information and by abuse of position.

Corruption: Illegal, immoral or dishonest behaviour.

Bribe: To ask or make someone do something for you, in return for payment (for example, but not limited to) payment, gifts, money or favours.

Anti-Bribery policy

Policy statement

The company prohibits:

- The offering, the giving, the solicitation, or the acceptance of any bribe, whether cash or any other inducement

To or from

- Any person or company, wherever they are situated, and whether they are a public official or body or private person or company

By



- Any individual employee, agent or other person or body acting on DKC Construction behalf

In order to

- Gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual

DKC Construction Limited recognises that market practice varies across the territories in which it does business and what is normal and acceptable in one place may not be in another. The policy prohibits any inducement which results in a personal gain or advantage to the recipient or any person or body associated with them, and which is intended to influence them to take action which may not be solely in the interests of the Company or of the person employing them or who they represent.

This policy is not meant to prohibit the following practices providing they are customary in a particular market, are proportionate and are properly recorded:

- Normal and appropriate hospitality
- The giving of a ceremonial gift on a festival or at any other special time

Inevitably, decisions as to what is acceptable may not always be easy. If anyone is in doubt as to whether a potential act constitutes bribery, the matter should be referred to the Managing Director before proceeding.

The prevention, detection and reporting of bribery is the responsibility of all employees within the DKC brand. Suitable channels of communication by which employees or others can report in confidence any suspicion of bribery will be maintained. A breach of this policy may result in disciplinary action being taken. In the event of a breach of the policy by other organisations, individuals or visitors, the Company will also take appropriate action.

6. Monitoring & Reviewing Policy

The policy will be monitored on an on-going basis to ensure that it addresses issues effectively. This will be in line with any revisions of legislation or organisational changes. Any improvements will be made from learning by experience and through the use of an established annual review. Any incidents of bribery, including any investigations and findings will be discussed at Management Review Meetings.

The Managing Director will review the risk of bribery regularly by looking at where their business is taking place, their currently commercial contracts, accounting and Company expenditure.

The Managing Director will also review the implementation of this policy in respect of its sustainability, adequacy and effectiveness and make improvements as appropriate.

7. Policy Amendments



**Anti-bribery procedure
Level 1 Manual**

Reference: MSP17
Revision: 1
Date: 12/05/2023
Page: 4 of 4

Should any amendments, revisions, or updates be made to this policy it is the responsibility of the Managing Director to see that all relevant employees receive notice. Written notice and/or training maybe considered. This policy will be communicated through our established internal communication channels. We will also communicate this policy to our suppliers, contractors and business partners and wider stakeholders.

8. Records

Records of all payments and receipts shall be kept with the company accounts. Any payments or receipt of payment made to or from third parties will need an accompanying invoice, bill or receipt.

Records made of payments or receipt of payment made to or from third parties by or to the company who do not have an accompanying invoice, bill or receipt shall be kept with the company accounts.

This is the policy statement of: DKC Construction Limited

The overall and final responsibility for this policy is that of: The Managing Director

Signed: David Cheast

Date: 19/05/2023

Name: DAVID CHEAST

Position: MANAGING DIRECTOR