

ANTI-BRIBERY & CORRUPTION POLICY STATEMENT



One of INFRATEC-UK's core values is to uphold responsible and fair business practices. It is committed to promoting and maintaining the highest level of ethical standards in relation to all of its business activities.

We are committed to ensuring that our business operates with the upmost integrity.

We, and those employed by us will not:

- Offer, promise, pay or provide bribes* to any person
- Request, agree to accept or receive bribes.
- Offer hospitality to Highways Agency staff that would breach the requirements of Annex A

We are committed to having robust procedures and controls in place within our business to minimize the risk of bribery with the aim of preventing bribery and confirm that we:

- Have a zero-tolerance of bribery offences throughout our organisation;
- Conduct risk assessments to identify and monitor potential bribery risks;
- Adopt due diligence measures to vet and approve third parties performing services on our behalf.
- Have clear, practical and accessible policies and procedures to address potential risks of bribery, and to prevent bribery;
- Provide education and awareness to all our employees
- Have a mechanism in place to allow employees to report potential bribery issues in confidence and have a process to deal with reports protecting the reporting individual.
- Deal effectively with any occurrences of bribery; and
- Act at all times in good faith, impartially and in accordance with a position of trust.

*** a bribe for this purpose being the provision of any financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for having already done so.**

A handwritten signature in dark ink, appearing to read 'David Bullock'.

David Bullock

Managing Director – INFRATEC-UK Ltd

1st January 2023

Annex A

Offer no -

- Gifts other than low-value items such as diaries or calendars (up to £10 in value). Calendars, diaries or other small items of office equipment may be offered and accepted but the gift must bear the company's name or insignia and can legitimately be regarded as being in the nature of advertising material
- Benefits and/or hospitality such as cocktail parties, receptions, presentations and conferences; and also invitations to social, cultural and sporting events
- Overnight accommodation and travel to and from a venue at which an event is being held