

## **AMA Scaffolding Policy –Bribery and Corruption Policy Statement**

It is our aim to be a highly respected company in the Scaffolding industry, our success in this is dependent upon how all our employees behave. It is also our policy to comply with UK law.

In the UK and in many other jurisdictions, it is a criminal offence to offer, promise or provide or request or accept - a bribe. In the UK it is also an offence for a commercial organisation to fail to prevent an incident of bribery being committed either by the company or by someone associated with it in order to obtain or retain a business advantage.

This means that bribery and corruption have absolutely no place at AMA Scaffolding Limited – and why we operate a strict no tolerance policy towards bribery in all its forms whether directly or through third parties.

This anti-bribery and corruption policy applies to all full and part-time employees, temporary staff and subcontractors who are employed or contracted wherever we work. It also applies to business partners and/or subcontractors who supply services to AMA Scaffolding Limited.

We also rely on the services of contractors, sub-contractors and consultants, and here we only want to do business with those who accept the terms of our policy or whose own policy sets standards to match our own.

This policy sets out our anti-bribery and corruption rules and explains what is expected of all AMA Scaffolding Limited personnel and associated persons – but we ask you all to do more than follow the rules. We want you to act according to the spirit and the values they represent in whatever you do for AMA Scaffolding Limited. In this way we can achieve our aims together and help drive up standards throughout the industry.

The Bribery Act 2010 (the 'Act') reformed the criminal law providing a new, modern and comprehensive scheme of bribery offences that enable courts and prosecutors to respond more effectively to bribery at home or abroad.

Key elements of the Act are:

- two general criminal offences which cover the offering, promising or giving of an advantage, and requesting, agreeing to receive or accepting of an advantage.
- a separate offence of bribery of a foreign public official
- an offence of failure by a commercial organisation to prevent a bribe being paid for or on its behalf (the only defence is if the organisation can show it has adequate procedures in place to prevent bribery).

Because AMA Scaffolding Limited is a UK registered and listed company, its subsidiaries, its directors, and employees are subject to the Act wherever they are located.

As befits a serious criminal offence, the penalties for engaging in bribery or corruption are severe. Companies can face punitive fines and individuals can be fined and/or imprisoned.

A conviction for a bribery or corruption related offence could have severe penalties for our reputation including exclusion from tender lists or being overlooked when bidding; loss of business; or a decrease in investor confidence, all of which could have severe financial consequences for our business.

Bribery and corruption can occur in many forms; so understanding them and recognising when they might occur is a key step in guarding against them.

**Bribery** is when a person offers, promises or gives a financial (or other) advantage to another person with the intention of inducing or rewarding that person to act improperly (active bribery), or when a person requests, agrees to receive or accepts a financial (or other) advantage to act improperly (passive bribery).

**Corruption** is any form of illegal, dishonest, or bad behavior, especially by people in positions of power.

In our industry, bribery could occur in situations such as tendering, appointing preferred suppliers, contractors and agents and so on. Bribery and corruption can be found at all levels from governments and government officials through to site operatives.

Wherever we work – even where bribery may be seen as the norm - we must be clear that we will

not participate in or condone any form of bribery in our dealings whether with the public or private sectors.

Bribes are not always a matter of handing over cash. Gifts, hospitality and entertainment can be bribes as well as offers of employment or gifts to charities if they are intended to influence a business decision.

Transparency and openness are effective weapons against bribery, so be ready to challenge any arrangements that compromise them. Even political contributions, charitable donations and sponsorship arrangements can be used as a subterfuge for bribery.

Our 'no tolerance' of bribery relies on every person at AMA Scaffolding Limited and our associated persons always choosing to do the right thing. All this takes is a few simple commitments:

**We will always:**

- Comply with this Anti-Bribery and Corruption Policy
- Comply with company policies on gifts and hospitality, political contributions and charitable donations
- Comply with our requirements concerning any conflicts of interest
- Record **all** activities and transactions accurately, completely and transparently
- Follow appropriate due diligence and risk mitigation procedures before proceeding with any contract or other arrangement
- Seek advice if unsure how to proceed
- Report any suspected or actual breaches of this policy promptly and accurately to the Director responsible for the prevention of Bribery and Corruption

**We will never:**

- Participate in any form of corrupt behavior
- Use company funds, in the form of payments or gifts and hospitality for any unlawful, unethical or improper purpose
- Authorise, make, tolerate or encourage, or invite or accept, any improper payments to obtain, retain or improve business
- Permit anyone to offer or pay bribes or make facilitation payments on our behalf, or do anything else we would not be permitted to do ourselves
- Offer or give anything of value to a public official (or their representative) to induce or reward them for acting improperly in the course of their public responsibilities
- Offer or accept gifts or hospitality, if we think this might impair objective judgement, improperly influence a decision or create a sense of obligation, or if there's a risk it could be misconstrued or misinterpreted by others.

While high profile cases of bribery, involving large sums of cash and senior executives, are most likely to hit the headlines, bribery can be a risk in many areas of our industry. It might take the form of:

- Facilitation payments
- Kickbacks and reciprocal agreements
- Corrupt third parties (including agents, consultants, contractors or sub-contractors)
- Excessive gifts and hospitality
- Inadequate financial controls or record keeping

**Facilitation payments** are usually small payments (or gifts) made to public officials in order to speed up or 'facilitate' actions the officials are already duty-bound to perform. We make no distinction between facilitation payments and bribes, regardless of their size or the local culture.

**Kickbacks and reciprocal agreements** or any other form of 'quid pro quo' are never acceptable. We will not participate in cartels, cover pricing, bid-rigging or any form of collusion. We will neither accept nor make improper payments to obtain new business, retain existing business, or secure any improper advantage.

**Corrupt third parties** can include a range of people acting on our behalf such as agents, consultants, contractors or sub-contractors. We wish to work only with those who are committed to our standards and will undertake due diligence to ensure this. We will engage a third party only when

there is a clear business rationale for doing so and with an appropriate contract. We will ensure all payments made to third parties are properly authorised and recorded.

**Excessive gifts and hospitality** can be used to exert improper influence on decision makers. We will only accept gifts and hospitality in accordance with our policy. We will ensure any gifts or hospitality we offer are reasonable in terms of value and frequency. We will never offer or accept gifts or hospitality if we feel it could influence a business decision or give the appearance of doing so.

**Inadequate financial controls or record keeping** can be exploited to hide bribes or corrupt practices. We will ensure we have robust controls in place so that our financial and other records are accurate and complete and never misleading.

If you have a concern or know of or suspect a violation of this policy we want you to speak up immediately. Please don't ignore it. Speaking up can be a difficult thing to do, so be reassured that all information received will be treated seriously and investigated appropriately.

If you act in good faith, believing your information is accurate, we will protect you even if you are wrong. Doing the right thing will not disadvantage your career or adversely affect your relationships at work. That is why we will not tolerate any form of discrimination or bullying of someone who has spoken up in good faith.

Bribery is a criminal offence which can lead to criminal penalties. But in addition, you have a duty to AMA Scaffolding Limited and breaches of this policy will result in prompt disciplinary action, up to and including dismissal/termination of contract.

This policy is designed to help you understand not just the legislation relevant to bribery and corruption but also to provide you with details of further help and training which you may need.

I am committed to this policy and would ask you to show your commitment too by reading it and, if you have any queries or concerns at all, please do not hesitate me.

**February 2025**

**MARTIN UNSTEAD**

**DIRECTOR**