

Anti-Bribery and Corruption Policy

Introduction

John Weaver (Contractors) are fully committed to operating a zero tolerance policy to bribery and corruption. The actions and conduct of the company's staff, as well as others acting on the company's behalf, are key to maintaining these standards.

Scope

This document sets out the Company's policy in relation to bribery and corruption and applies strictly to all employees, directors, sub-contractors and all third parties who work with us in whatever capacity, whether site or office based.

Definition

A 'bribe' is anything of value that is offered, promised, given or received by any party to influence a decision or to gain or reward an improper or unfair advantage for the benefit of the company. Facilitation payments come into this category and are considered bribes.

'**Corruption**' is the misuse of entrusted power for personal gain.

Policy Commitment

John Weaver (Contractors) will not tolerate any form of bribery or corruption and expects all employees to adhere to the following:-

- You must not offer, pay, make, seek or accept a bribe (as per definition above);
- You must comply with the anti-bribery and corruption laws to which you and John Weaver (Contractors) are subject;
- You must ensure that people who work for you and John Weaver (Contractors) understand that bribery and corruption are unacceptable;
- You are liable to disciplinary action, dismissal, legal proceedings and potential imprisonment if you become involved in bribery and corruption.

Penalties

The Bribery Act 2010 states that bribery by individuals is punishable by up to 10 years imprisonment (depending upon the severity of the offence) and/or an unlimited fine.

If an organisation has been deemed to have allowed the bribery to take place they too will have an unlimited fine, they will be told to implement serious crime prevention orders to ensure bribery offences do not occur in the future. Any financial gain the organisation received due to the bribery offence must be returned and disqualification of the directors will also occur as they have demonstrated a lack of top level commitment. They will also be disqualified from holding a position as a director for 15 years.

Risk Areas

Bribery can be a risk in many areas of the Company, below are the key areas you should be aware of in particular:

- Excessive gifts, entertainment and hospitality can be used to exert improper influence on decision makers.
- Facilitation payments are used by businesses or individuals to secure or expedite the performance of a routine or necessary action to which the payer has an entitlement as of right, the Company will not tolerate or excuse such payments being made.
- Reciprocal agreements - improper payments to obtain new business, retain existing business or secure any improper advantage should never be accepted or made.
- Actions by third parties for which the Company may be held responsible can include a range of people, i.e. agents, contractors and consultants acting on the Company's behalf, appropriate due diligence should be undertaken before a third party is engaged. Third parties should only be engaged where there is clear business rationale for doing so, with an appropriate contract.
- Record keeping can be exploited to conceal bribes or corrupt practices, we must ensure that we have robust controls in place so that our records are accurate and transparent.

Responsibility/Raising Concerns

The prevention, detection and reporting of bribery or corruption is the responsibility of all employees and third parties throughout the Company. If you suspect that bribery is taking place or some form of corruption is planned then it is your duty to report it - in confidence - to your line manager, or if this is not appropriate, a Director.



Terry Edwards
Managing Director
John Weaver Contractors Limited
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