

Bribery Policy Statement

General Statement

It is Barnwood Limited (including its parent company Barnwood Group Limited) hereinafter referred to as the 'company' policy to conduct all of our business in an honest and ethical manner.

We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships. We do not tolerate bribery and corruption in any form whether directly or through third parties. Bribery and corruption occur in many forms, so awareness and recognising when this may occur is essential to managing the risk.

We are committed to comply with the Bribery Act 2010 throughout the company.

Who must comply with this policy?

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, casual workers, agents, contractors, external consultants, and business partners.

What is bribery?

Bribery means a financial or other inducement or reward for action that is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit.

Bribery includes offering, promising, giving, accepting or seeking a bribe.

All forms of bribery are strictly prohibited.

High Risk Transactions

The Company recognises that certain types of transactions and business arrangements present a higher risk of bribery or corrupt practices, particularly within the construction industry. These high-risk transactions include, but are not limited to:

- Payments to government officials or regulatory authorities.
- Use of agents, intermediaries, or consultants to obtain permits, licenses, or approvals.
- Bidding and tendering processes for public or private contracts.
- Subcontractor and supplier selection where relationships may influence outcomes.
- Facilitation payments or "expedited service" fees.
- Gifts, hospitality, or entertainment offered to persons in decision-making positions.

All high-risk transactions must be subject to enhanced due diligence and prior written approval from the Finance Director. Employees must document the purpose, value, and business justification of such transactions and ensure they are transparent, accurately recorded in the gifts and hospitality log, and compliant with all applicable anti-bribery and corruption laws.

Any failure to disclose or properly manage a high-risk transaction will be treated as a serious breach of this Policy and may result in disciplinary action, up to and including termination, as well as potential legal consequences.

Charitable and Political Donations

The Company is committed to supporting the communities in which it operates. However, charitable contributions and political donations carry a heightened risk of being misused as a means of bribery or undue influence.

Charitable Donations

- All charitable donations made on behalf of the Company must be transparent, properly documented, and serve a genuine charitable purpose.
- Donations may **not** be offered or made with the intent of improperly influencing a business decision, securing a contract, or obtaining an advantage.
- Prior written approval from the Finance Director is required before making any charitable contribution.

Political Donations

- The Company has a strict policy of **not making political donations**, whether in cash, in kind, or through sponsorship, to political parties, candidates, or public officials, to avoid any appearance of impropriety.
- Employees are free to make personal political contributions in their own time and with their own resources, provided such contributions do not attempt to influence or secure a business advantage for the Company.
- Company resources (including funds, assets, time, or facilities) must never be used to support political campaigns or parties.

Red Flags to Watch For

Employees must be alert to situations where charitable or political donations may pose a bribery or corruption risk, including:

- A government official, regulator, or client requests or pressures the Company to donate.
- A donation is linked to obtaining or retaining a contract, permit, or favourable decision.
- The proposed charity or organisation has no clear track record, financial transparency, or identifiable charitable purpose.
- A request for payment is made in cash, to a personal account, or to an offshore/third-party account.
- The donation is unusually large or out of proportion to the Company's typical charitable contributions.

- The recipient organisation is closely linked to a political figure, public official, or decision-maker relevant to the Company's projects.
- Lack of proper receipts, acknowledgments, or documentation confirming how the funds will be used.

Gifts and hospitality

This policy does not prohibit the giving or accepting of reasonable and appropriate hospitality for legitimate purposes such as building relationships, maintaining our image or reputation, or marketing our products and services. However, all hospitality activities must be recorded on the gifts & hospitality allowing review and approval by a Director where required.

A gift or hospitality will not be appropriate if it is unduly lavish or extravagant or could be seen as an inducement or reward for any preferential treatment (for example, during contractual negotiations or a tender process).

Gifts must be of an appropriate type and value depending on the circumstances and taking account of the reason for the gift. Gifts must not include cash or cash equivalent (such as vouchers) or be given in secret.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. Any non-employee who breaches this policy may have their contract terminated with immediate effect.

This policy does not form part of any employee's contract of employment and we may amend it at any time. It will be reviewed regularly.

Policy Control

Ratified by Board of Directors

19th December 2024

Formally signed

13th July 2026

Last Reviewed dated:

13th July 2026

Next Review Date:

4th January 2027

On behalf of Barnwood Limited

Matthew Williams
CEO
Barnwood Limited

Chris Preece
Managing Director
Barnwood Shopfitting &
Interiors Division

Gus McKenna
Managing Director
Barnwood General Works Division

Stuart Pearce
Joint Managing Director
Barnwood Construction Division

Will Steel
Joint Managing Director
Barnwood Construction
Division