

-----Civil Engineering and Plant Hire-----

ANTI-BRIBERY POLICY

The McCarthy Contractors recognises that the giving or receiving of bribes is contrary to the Bribery Act 2010 and can play no part in the way in which McCarthy Contractors carries out its business.

This Policy applies McCarthy Contractors, their officers, directors and employees whether permanent or temporary. It also applies to all McCarthy Contractors supply chain partners, including agents, advisers, consultants, joint-venture partners and sub-contractors (together "Associated Persons").

To achieve this, McCarthy Contractors will:

- Not engage in any form of bribery or corruption
 - Not offer, provide, authorise, request or receive bribes or anything that could give the perception of a bribe.
 - Prohibit its officers, employees and Associated Persons from offering, making or, paying any "facilitation payments" to any third party including, but not limited to, foreign public officials. All McCarthy Contractors officers and employees must report to the Managing Director and Company Secretary any request by a third party for a facilitation payment.
 - Not use funds and resources to contribute to any political campaign, political party, political candidate or any of their affiliated organisations with the intention of obtaining a business or any other advantage in the conduct of business. McCarthy Contractors will not use charitable donations as a substitute for political payments.
 - Only make charitable contributions or sponsorships on behalf of or in the name of McCarthy Contractors for bona fide charitable purposes and where the activities are aligned with McCarthy Contractors business objectives, values and ethical principles.
 - Require every officer, director and employee to declare any benefits they are offered or they accept that they estimate would have cost the provider more than £200 per person to provide.
 - Only contract with Associated Persons and engage with business partners who demonstrate at all times business integrity and who practice ethical conduct which meets the standards set out in this Policy and all applicable laws and regulations.
 - Ensure that officers and employees (whether permanent or temporary) in commercial or customer or supply chain facing positions receive training on anti-bribery compliance.
- McCarthy Contractors considers a breach of this Policy as a serious offence. Any violation will result in disciplinary action, up to and including dismissal of an individual in appropriate circumstances.

Compliance with this Policy by all relevant officers and employees and all Associated Persons will be reviewed annually to ensure it is suitable, effective and consistently Implemented.

Signed

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J.G. McCarthy Managing Director Date: 1st September 2023 Issue 02 Page 1 of 1

