

Anti-Bribery and Corruption Policy

Introduction

Soils and Stone is committed to ensuring that the conduct of our staff, as well as those acting on our behalf, are of the highest ethical standards.

The aim of this document is to set out Soils and Stone's policy in relation to bribery and corruption. This policy applies to all employees, directors, contractors and to any other parties associated with Soils and Stone.

Understanding and recognising bribery and corruption

Acts of bribery or corruption are designed to influence an individual in the performance of their role and to get them to act in a way that a reasonable person would consider to be dishonest.

- **Bribery** can be defined as 'offering, promising or giving a financial (or other) advantage to another person with the intention of inducing or rewarding that person to act or for having acted in a way which a reasonable person would consider improper in the circumstances'. Bribes are not always a matter of handing over cash. Gifts, hospitality and entertainment can be bribes if they are intended to influence a decision.
- **Corruption** is defined as 'any form of abuse of entrusted power for private gain'. This may include, but is not limited to, bribery.

Penalties

Under that Bribery Act, bribery by individuals is punishable by up to ten years' imprisonment and/or an unlimited fine. If the firm is found to have taken part in the bribery or is found to lack adequate procedures to prevent bribery, it too could also face an unlimited fine.

A conviction for a bribery or corruption related offence has severe reputational and/or financial consequences for any firm.

Soils and Stone's Policy

Soils and Stone will not tolerate bribery or corruption in any form. It is unacceptable to:

- Give, promise to give, or offer a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given
- Give, promise to give, or offer a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure;
- Accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them;

- Accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return
- Retaliate against or threaten a person who has refused to commit a bribery offence or who has raised concerns under this policy
- Engage in an activity that is in breach of this policy

It may not always be easy to determine which course of action is appropriate. If you are in any doubt as to whether a possible act would be in breach of this policy or the law, the matter should be referred to a Director of Soils and Stone.

Soils and Stone will investigate thoroughly any actual or suspected breach of this policy. Employees found to be in breach of the policy may be subject to disciplinary action which could ultimately result in their dismissal.

Areas of Risk

Detailed below are a selection of areas you should be aware of:

- **Excessive gifts, entertainment and hospitality:** that are used to exert improper influence on decision makers.
- **Payments:** that are used by businesses or individuals to secure or expedite an action to which the payer has an entitlement or benefit.
- **Reciprocal agreements:** unless they are legitimate business arrangements which are properly documented and approved by management. Improper payments to obtain new business, retain existing business or secure any improper advantage should not be accepted or made.
- **Actions by third parties for which Soils and Stone may be held responsible:** this may include a range of others acting on our behalf. An appropriate level of fact finding should be undertaken before any third party is engaged. Third parties should only be engaged where there is a clear business reason for doing so and an appropriate contract established. Any payments to third parties should be authorised and recorded.
- **Record keeping:** can be exploited to conceal bribes or corrupt practices. We must ensure that our records are accurate and transparent.

Employee responsibility and how to raise a concern

The prevention, detection and reporting of bribery or corruption is the responsibility of all employees throughout Soils and Stone. If you become aware or suspect that an activity or conduct which is proposed or has taken place is a bribe or corrupt, then you have a duty to report it to a Director of Soils and Stone in confidence.