

## ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

**Company:** P A Collacott & Co

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### 1. What Does This Policy Cover?

#### 1.1

This Anti-Bribery and Anti-Corruption Policy exist to set out the responsibilities of P A Collacott & Co and those who work for us in relation to observing and upholding our zero-tolerance position on bribery and corruption.

#### 1.2

It also acts as a source of information and guidance for those working for P A Collacott & Co. It helps individuals recognise and deal with bribery and corruption issues and understand their responsibilities.

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### 2. Policy Statement

#### 2.1

P A Collacott & Co is committed to conducting business in an ethical and honest manner and to implementing and enforcing systems that ensure bribery is prevented. The Company has a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all business dealings and relationships.

#### 2.2

P A Collacott & Co will comply with all laws relating to anti-bribery and corruption in every jurisdiction in which it operates. The Company is bound by the laws of the United Kingdom, including the **Bribery Act 2010**, in relation to its conduct both in the UK and abroad.

#### 2.3

P A Collacott & Co recognises that bribery and corruption are criminal offences punishable by up to ten years' imprisonment and/or unlimited fines. If the Company is found to have been involved in corrupt activities, it may face:

- Unlimited fines;
- Exclusion from tendering for public contracts;
- Serious reputational damage; and
- Other regulatory or legal sanctions.

The Company is therefore committed to preventing bribery and corruption and to complying fully with all legal obligations.

## 2.4

P A Collacott & Co is committed to full compliance with the **UK Bribery Act 2010**. The Company prohibits:

- a. Offering, promising or giving a bribe;
- b. Requesting, agreeing to receive or accepting a bribe;
- c. Bribing a foreign public official; and
- d. Engaging in conduct that could lead to the corporate offence of failure to prevent bribery.

The Company will maintain proportionate procedures designed to prevent bribery and corruption by any person associated with the business.

## 2.5

The Company may be held criminally liable if a person associated with it bribes another person intending to obtain or retain business or a business advantage for the Company. All employees, contractors, agents, consultants and business partners must therefore comply with this policy and support the Company's anti-bribery controls.

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## 3. Who Is Covered by the Policy?

### 3.1

This policy applies to all:

- Employees (temporary, fixed-term and permanent);
- Consultants;
- Contractors;
- Trainees;
- Seconded workers;
- Home workers;
- Casual workers;
- Agency workers;
- Volunteers;
- Interns;
- Agents;
- Sponsors; and

- Any other persons associated with P A Collacott & Co.

The policy also applies to Directors, Officers, Trustees, Board Members and Committee Members at any level.

### 3.2

For the purposes of this policy, "third party" refers to any individual or organisation with whom the Company interacts, including:

- Clients;
- Customers;
- Suppliers;
- Distributors;
- Business contacts;
- Agents;
- Advisers;
- Government and public bodies;
- Politicians and political parties; and
- Their representatives and officials.

### 3.3

Any arrangements the Company makes with a third party shall be subject to clear written contractual terms, including provisions requiring compliance with:

- The Bribery Act 2010;
- This Policy; and
- Any applicable anti-corruption legislation.

Appropriate due diligence shall be undertaken before engagement and periodically thereafter where necessary.

### 3.4

For the purposes of the **Bribery Act 2010**, the term "**associated person**" includes any individual or organisation performing services for or on behalf of P A Collacott & Co.

This may include:

- Employees;
- Agents;
- Consultants;

- Intermediaries;
- Contractors;
- Suppliers;
- Joint venture partners; and
- Other third parties.

### **3.5**

Appropriate due diligence will be undertaken on third parties where there is a potential bribery risk. The extent of due diligence will be proportionate to the nature and level of risk presented.

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## **3.6 Third-Party Due Diligence**

### **3.6.1**

P A Collacott & Co recognises that third parties acting on its behalf may present bribery and corruption risks. The Company will undertake appropriate and proportionate due diligence before entering business relationships and will conduct ongoing monitoring where necessary.

### **3.6.2**

Third parties include, but are not limited to:

- Agents and intermediaries;
- Consultants and advisers;
- Contractors and subcontractors;
- Suppliers and service providers;
- Joint venture partners;
- Representatives;
- Introducers; and
- Any person or organisation acting on behalf of the Company.

### **3.6.3**

Due diligence may include:

- Verification of identity, ownership and business activities;
- Assessment of reputation and integrity;
- Review of previous allegations, investigations or convictions;
- Confirmation of anti-bribery procedures;

- Assessment of links to government officials or politically exposed persons; and
- Consideration of country, sector and transaction-specific risks.

#### **3.6.4**

No employee shall engage, appoint or continue a relationship with a third party where there are reasonable grounds to believe the third party may engage in bribery, corruption or other unlawful conduct.

#### **3.6.5**

Significant business relationships shall be supported by written contracts containing appropriate anti-bribery provisions, including rights to:

- Require compliance with the Bribery Act 2010;
- Require compliance with this Policy;
- Request evidence of compliance;
- Audit compliance where appropriate; and
- Terminate the relationship where bribery or corruption is suspected or confirmed.

#### **3.6.6**

Employees must remain alert to "red flags", including:

- Unusually high commissions or fees;
- Requests for cash payments;
- Offshore payment requests;
- Refusal to provide documentation;
- A history of unethical conduct;
- Close relationships with government officials; or
- Requests to bypass normal approval procedures.

#### **3.6.7**

Any concerns identified during due diligence or within a business relationship must be reported immediately to the Managing Director.

#### **3.6.8**

Records of due diligence assessments, approvals and monitoring activities shall be maintained as evidence of compliance.

### 3.6.9

Where appropriate, third-party relationships will be reviewed periodically to ensure that the level of risk remains acceptable and that due diligence information remains accurate and current. Additional due diligence may be undertaken where circumstances change or where new risks are identified.

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## 4. Definition of Bribery

### 4.1

Bribery refers to the offering, giving, promising, requesting, agreeing, receiving or soliciting of something of value to influence a decision or action.

### 4.2

A bribe includes any inducement, reward or object of value intended to obtain:

- Commercial advantage;
- Contractual advantage;
- Regulatory advantage; or
- Personal advantage.

### 4.3

Bribery is not limited to offering a bribe. Accepting or agreeing to receive a bribe is also unlawful.

### 4.4

Employees must not engage in any form of bribery, either directly or indirectly through third parties. Employees must not bribe foreign public officials and must seek advice from the Managing Director if unsure whether something constitutes bribery.

### 4.5

Bribes may include:

- Cash payments;
- Gifts;
- Hospitality;
- Travel;
- Accommodation;
- Entertainment;
- Loans;

- Favourable terms;
- Charitable donations;
- Employment opportunities;
- Preferential treatment; or
- Any other financial or non-financial advantage.

#### 4.6

An offence may still be committed even if:

- A bribe is offered but not accepted;
- No business advantage is obtained;
- The conduct takes place outside the UK; or
- The activity is conducted through an intermediary.

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### 5. What Is and Is Not Acceptable?

This section covers:

- Gifts and hospitality;
- Facilitation payments;
- Political contributions; and
- Charitable contributions.

#### 5.1 Gifts and Hospitality

The Company may accept reasonable and proportionate hospitality provided it:

- a. Is not intended to influence a business decision;
- b. Is not given in return for a favour;
- c. Complies with applicable laws;
- d. Is given in the Company's name;
- e. Is reasonable, proportionate and given in good faith;
- f. Is appropriate to the circumstances;
- g. Is appropriate in value and timing;
- h. Is given openly and transparently;
- i. Is not targeted at influencing key decision-makers;

j. Does not exceed £100 without approval; and

k. Is not offered to government officials without prior approval from the Managing Director.

## 5.2

Where it would be inappropriate to decline a gift due to local customs or cultural sensitivities, it may be accepted provided it is declared to the Managing Director.

## 5.3

Business customs differ across countries, cultures and industries. Employees should always consider the circumstances and seek advice where necessary.

## 5.4

All gifts, hospitality, entertainment or other benefits exceeding **£50** must be declared and recorded in the Company's Gifts and Hospitality Register.

## 5.5

Any gift or hospitality exceeding **£100** requires prior approval from the Managing Director.

## 5.6

Gifts and hospitality must never:

- Create an obligation;
- Influence a business decision;
- Coincide with a tender or procurement exercise;
- Be offered in cash; or
- Be offered as cash equivalents, vouchers, gift cards or loans.

## 5.7 Risk Assessments

The Company will periodically assess bribery risks, including:

- Country risk;
- Sector risk;
- Transaction risk;
- Business partnership risk; and
- Intermediary or agent risk.

Appropriate controls will be implemented based upon the results.

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## 5.8 Facilitation Payments and Kickbacks

#### **5.8.1**

P A Collacott & Co prohibits facilitation payments in any form.

#### **5.8.2**

The Company prohibits giving or receiving kickbacks.

#### **5.8.3**

Where a payment is made due to an immediate threat to personal safety, the employee must:

- a. Keep the payment to the minimum amount possible;
- b. Request a receipt;
- c. Create a written record; and
- d. Report the incident immediately to their Line Manager.

#### **5.8.4**

Employees must complete mandatory anti-bribery training and cooperate with reviews, audits and investigations.

#### **5.8.5**

Employees must immediately declare any actual, potential or perceived conflict of interest.

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### **5.9 Political Contributions**

P A Collacott & Co will not make donations or contributions to political parties, candidates or political organisations.

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### **5.10 Charitable Contributions**

#### **5.10.1**

The Company supports charitable giving and community involvement.

#### **5.10.2**

Employees must ensure charitable donations are not used to conceal bribery.

#### **5.10.3**

All charitable donations require prior approval from the Managing Director.

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## **6. Employee Responsibilities**

### **6.1**

Employees must read, understand and comply with this policy.

## **6.2**

All employees share responsibility for preventing, detecting and reporting bribery and corruption.

## **6.3**

Any suspected breach of this policy must be reported to the Managing Director immediately.

## **6.4**

Breaches of this policy may result in disciplinary action up to and including dismissal for gross misconduct.

## **6.5**

Any actual, potential or perceived conflict of interest declared by an employee shall be recorded and, where necessary, managed through appropriate mitigating actions. The Company may maintain a register of declared conflicts of interest to support transparency and compliance.

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## **7. Raising Concerns**

### **7.1 How to Raise a Concern**

Employees are encouraged to raise concerns about bribery or corruption as early as possible.

The Company will ensure all employees are familiar with whistleblowing procedures.

### **7.2 If You Are a Victim of Bribery or Corruption**

You must notify your Line Manager or the Managing Director immediately if:

- You are offered a bribe;
- You are asked to make a bribe;
- You suspect bribery may occur; or
- You believe you are involved in another corrupt activity.

### **7.3 Protection**

The Company will support anyone who raises a concern in good faith.

#### **7.3.1**

No employee will suffer detrimental treatment for:

- Refusing to give or receive a bribe; or
- Reporting concerns in good faith.

### 7.3.2

Detrimental treatment includes:

- Dismissal;
- Disciplinary action;
- Threats;
- Harassment; or
- Unfair treatment.

### 7.3.3

Employees who believe they have suffered retaliation should report this immediately.

### 7.3.4

All reports of suspected bribery or corruption will be investigated promptly, fairly and confidentially. Employees are required to cooperate fully with any investigation, review or audit relating to bribery, corruption or other unethical conduct.

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## 8. Training and Communication

### 8.1

The Company's zero-tolerance approach to bribery and corruption will be communicated to suppliers, contractors, business partners and relevant third parties.

### 8.2

All employees will receive anti-bribery and anti-corruption awareness training appropriate to their roles and responsibilities. Additional training will be provided to employees whose work exposes them to higher bribery or corruption risks.

### 8.3

Refresher training will be provided periodically and whenever significant changes occur to legislation, regulatory requirements, Company procedures or identified risks.

### 8.4

Records relating to:

- Gifts and hospitality;
- Charitable donations;
- Sponsorships;
- Third-party due diligence; and

- Training

shall be maintained in accordance with Company document retention procedures.

## **8.5**

The Company will maintain procedures reflecting the six principles of the Ministry of Justice guidance:

- Proportionate procedures;
- Top-level commitment;
- Risk assessment;
- Due diligence;
- Communication and training; and
- Monitoring and review.

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## **9. Record Keeping**

### **9.1**

The Company will maintain complete, accurate and transparent records.

### **9.2**

No undisclosed accounts, funds or assets shall be established.

### **9.3**

False, misleading, incomplete or artificial accounting entries intended to conceal improper payments are strictly prohibited.

### **9.4**

The Company will maintain detailed financial records and adequate internal controls as evidence of all payments.

### **9.5**

All gifts and hospitality given or received must be recorded and may be subject to management review.

### **9.6**

The Company may periodically review and analyse records relating to gifts and hospitality, charitable donations, third-party relationships, training completion rates and reported concerns to identify trends, assess compliance and strengthen anti-bribery controls.

## **10. Monitoring and Review**

### **10.1**

The Managing Director is responsible for monitoring the effectiveness, implementation and review of this Anti-Bribery and Anti-Corruption Policy and ensuring that appropriate resources are made available to support compliance.

### **10.2**

Internal controls and anti-bribery procedures will be reviewed regularly to ensure effectiveness.

### **10.3**

Employees are encouraged to provide feedback to improve this policy.

### **10.4**

The Company may amend this policy at any time.

### **10.5**

The Company will periodically review:

- Bribery and corruption risk assessments;
- Third-party due diligence procedures;
- Gifts and hospitality records;
- Training records;
- Internal controls; and
- Any incidents, investigations or concerns raised under this policy.

The purpose of these reviews is to ensure that anti-bribery controls remain effective, proportionate and aligned with the risks facing the business.

Signed:



Dated: 6<sup>th</sup> July 2026

Managing Director

For and on behalf of P A Collacott & Co



**DOCUMENT HISTORY**

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01	1st Issue of Document	PF	10/10/2024	10/10/2025
01	Reviewed	PF	16/02/2026	16/02/2027
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