



ANTI-BRIBERY, CORRUPTION & COMPETITION LAW POLICY

The following document sets out Paye Stonework & Restoration Limited's (the "Company") policy on Anti-Bribery and Corruption. The company is committed to ensuring that its business is conducted according to ethical, professional and legal standards in a fair, honest and open manner. We will endeavour to ensure that this is reflected in every aspect of business that we undertake, so that we bring integrity to all our dealings.

Bribery and corruption expose the Company, its employees and business partners to the risk of criminal prosecution, in addition to harming the Company's reputation. Accordingly, we operate a zero-tolerance approach to all forms of bribery and corruption. It is vital that we ensure that our employees and those who work on our behalf understand their responsibilities and operate to high ethical standards.

IMPLEMENTATION

The aim of the policy is to establish a culture within the Company and within our business partners and supply chain in which bribery and corruption are never tolerated

We prohibit the offering of a bribe in any form, including kickbacks, facilitations payments or the use of other routes or channels to provide improper benefits to customers, agents, contractors, suppliers or employees of any such party or government officials.

We also prohibit any employee or business partner from accepting a bribe, facilitation payment or kickback from customers, agents, contractors, suppliers or employees of any such party or from government officials, for their own benefit or that of their family, friends, associates or acquaintances.

We oppose all forms of bribery and corruption, large as well as small, whether initiated by corrupt officials or corrupt companies or individuals and whether it takes place in the public or private sector or in the UK or abroad.

The Company has adopted a 10 point plan to combat bribery and corruption:

- The commitment from the Director's to the Company's 10-point action plan and arrangements for preventing and detecting bribery and corruption.
- The Directors will be required to oversee the development and implementation of this policy and to monitor compliance.
- The assessment of risk of bribery and corruption within the Company and the development of effective, efficient and transparent controls to reduce exposure to those risks.
- The establishment of a clearly articulated and visible Anti-Bribery and Corruption Policy to implement the Company's principles prohibiting bribery and corruption at all levels of the business. This policy is communicated to all employees throughout the Company and to our business partners and supply chain
- The adoption of appropriate and proportionate due diligence on business partners, sub-contractors, and suppliers coupled with a requirement that they implement adequate procedures for the prevention of bribery and corrupt practices, in accordance with the Bribery Act 2010 and pass this obligation onto their own supply chains.
- Guidance to all relevant individuals throughout the Company so that compliance with our policies is the duty of all relevant employees at all levels and so that individuals can recognise bribery and corruption and take steps to avoid the same.
- A requirement that our employees remain vigilant and report any suspicion of bribery or corruption or improper business practices through the whistle-blowing channels described in the Code of Business Conduct and Ethics to enable proper and thorough investigations to be carried out.
- The use of financial and accounting procedures, including a system of internal controls, designed to ensure no one individual is able to unduly influence a business decision of the Company and to ensure the maintenance of fair and accurate books, records and accounts which cannot be used to hide bribery or corruption.
- The imposition of appropriate disciplinary and other sanctions for violations of our policies and procedures and/or laws against bribery and corruption.
- Annual audits and reviews of the Company's anti-bribery and corruption policy and procedures to monitor, evaluate, and improve their effectiveness.

COMPETITION LAW

Employees shall conduct business in compliance with applicable competition laws including the UK Competition Act 1998.



Prohibited anti-competitive practices include:

- Fixing prices or other terms and conditions with competitors
- Sharing competitively sensitive information such as pricing with competitors
- Bid-rigging
- Abuse of dominant market position

Paye Stonework & Restoration Ltd will compete fairly and ethically within the framework of applicable competition laws. Employees should seek advice from the Legal department in case of any doubts.

Failure to comply with this Policy may result in disciplinary action, including dismissal (employees) or appropriate sanctions (supply chain) in addition to civil or criminal charges.

Dominic Peachy
Managing Director

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