

CLAYWOOD CONSTRUCTION LTD

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ANTI-CORRUPTION AND BRIBERY POLICY

Company Policy Document

Document Reference	CWP2A
Version	3.0
Policy Title	Anti-Corruption and Bribery Policy
Authorised By	Paul Burke - Managing Director
Issue Date	29 May 2026
Review Date	29 May 2027
Applies To	All employees, contractors, agency workers, volunteers, and third-party representatives acting on behalf of Claywood Construction Ltd
Legislative Basis	Bribery Act 2010

1. Policy Statement

It is the policy of Claywood Construction Ltd to conduct all our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate.

The Bribery Act 2010 creates a corporate offence of failing to prevent bribery. The only available defence is demonstrating that adequate procedures were in place to prevent bribery from occurring. This policy, together with our training programme, due diligence processes, and monitoring arrangements, forms part of those adequate procedures.

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.

2. 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 and Directors
- Officers, Agency Workers, Seconded Workers, Volunteers, and Interns
- Agents, Contractors, and External Consultants
- Third-party representatives and business partners

This policy does not form part of any employee's contract of employment and may be amended at any time.

3. Risk Assessment

Claywood Construction Ltd recognises that the construction sector carries an elevated risk of bribery and corruption, particularly in connection with procurement decisions, subcontractor appointments, tender processes, and dealings with public sector clients and officials.

The Managing Director is responsible for periodically assessing the bribery and corruption risks facing the business, having regard to the nature of our contracts, the jurisdictions in which we operate, and the profile of our supply chain. The outcomes of this assessment will inform the controls and procedures in place under this policy.

All staff involved in procurement, tendering, or supplier and subcontractor relationships should be alert to the risks associated with those activities and must comply fully with this policy in all such dealings.

4. What is Bribery?

Definition of a Bribe

A bribe means a financial or other inducement or reward for action which 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.

Definition of Bribery

Bribery includes offering, promising, giving, accepting, or seeking a bribe. All forms of bribery are strictly prohibited. If you are unsure about whether a particular act constitutes bribery, raise it with your manager immediately.

5. Prohibited Actions

Specifically, you must not:

- Give or offer any payment, gift, hospitality, or other benefit in the expectation that a business advantage will be received in return, or to reward any business received.
- Accept any offer from a third party that you know, or suspect, is made with the expectation that we will provide a business advantage for them or anyone else.
- Give or offer any payment (sometimes called a facilitation payment) to a government official in any country to facilitate or speed up a routine or necessary procedure.

- Make or receive any political donation on behalf of Claywood Construction Ltd

Important: You must not threaten or retaliate against another person who has refused to offer or accept a bribe, or who has raised concerns about possible bribery or corruption. Whistleblowing in good faith is fully protected under this policy and under applicable legislation.

6. Due Diligence on Third Parties

As part of our commitment to preventing bribery in our supply chain, Claywood Construction Ltd applies appropriate due diligence before engaging suppliers, subcontractors, agents, and other business partners. The level of due diligence applied will be proportionate to the risk presented by the relationship. This may include:

- Pre-qualification checks and supplier questionnaires
- Review of the third party's own anti-bribery policies and procedures
- Consideration of the nature of the services to be provided and the context in which they will be delivered.
- Ongoing monitoring of established relationships where the risk profile warrants it.

Where a third party is found to have engaged in bribery or corruption, Claywood Construction Ltd reserves the right to terminate the relationship with immediate effect.

7. Gifts and Hospitality

This policy does not prohibit the giving or accepting of reasonable and appropriate hospitality for legitimate business purposes, such as building relationships, maintaining our image or reputation, or marketing our products and services.

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.

Acceptable Gifts

Gifts must meet all the following criteria to be considered appropriate:

- Of an appropriate type and value given the circumstances and the reason for the gift
- Not cash or cash-equivalent (such as vouchers)
- Not given in secret — all gifts must be transparent and declared.
- Given in the name of Claywood Construction Ltd, not in an individual's personal name.
- Promotional gifts of low value such as branded stationery may be given to or accepted from existing customers, suppliers, and business partners.

Declaration Requirement

You must declare and keep a written record of all hospitality or gifts given or received, regardless of value. Records must be submitted to the Managing Director promptly and will be maintained in a central Gifts and Hospitality Register which will be reviewed periodically.

8. Record-Keeping

You must submit all expenses claims relating to hospitality, gifts, or payments to third parties in accordance with our expenses policy and record the reason for expenditure.

All accounts, invoices, and other records relating to dealings with third parties — including suppliers and customers — should be prepared with strict accuracy and completeness.

Zero Tolerance: Accounts must not be kept “off book” to facilitate or conceal improper payments. Any breach of this requirement will be treated as gross misconduct.

9. Training and Awareness

Training on this policy, and on the bribery and corruption risks facing the business, forms part of the induction process for all individuals who work for us or on our behalf.

Refresher training will be provided on a regular basis and whenever material changes are made to this policy. Enhanced training will be provided to staff involved in procurement, tendering, supplier management, and any other roles identified as carrying higher risk.

Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

10. How to Raise a Concern

If you are offered a bribe, or are asked to make one, or if you suspect that any bribery, corruption, or other breach of this policy has occurred or may occur, you must:

- Notify your line manager as soon as possible.
- Where your concern involves your line manager, report directly to a director.
- Document the concern in writing wherever possible, noting dates, persons involved, and what was offered or requested.

All reports will be treated in confidence. Claywood Construction Ltd is committed to ensuring that no employee suffers any detriment for raising a genuine concern in good faith.

11. Breaches of this Policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct depending on the severity of the breach.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

We will co-operate fully with any regulatory or law enforcement investigation into suspected bribery or corruption.

12. Policy Authorisation

This policy has been reviewed, approved, and authorised by the Managing Director of Claywood Construction Ltd. It is effective from the date of signing below and will be reviewed annually or sooner in the event of legislative or organisational change.

Signed	
Name	Paul Burke
Position	Managing Director
Issue Date	29 May 2026
Next Review Date	29 May 2027
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