

ANTI – BRIBERY CORRUPTION POLICY

1. Introduction

This policy sets out the ALB Brickwork Ltd's stance on the implementation and management of anti-bribery and corruption measures across the Company's business operations in accordance with the Company's Ethical Code of Business Conduct and the UK Bribery Act 2010.

ALB Brickwork Ltd acts with the highest standards of integrity and honesty in all it does; adherence to best practice governance, controls and compliance are essential for maximising shareholder value, thereby helping customers to have confidence when entrusting their business to the Group

ALB Brickwork Ltd recognises that bribery and corruption have an adverse effect on communities wherever they occur and is committed to enforcing high moral and ethical standards in all business activities.

1 Summary of UK Legislation

The main piece of legislation in the UK is the Bribery Act 2010.

The key offences are those of:

- Active bribery; passive bribery
- Bribing a foreign public official
- a commercial organisation failing to prevent actions by its employees, agents or subsidiaries.

Apart from the "commercial organisation" offence noted above, all the offences apply equally to the public, private & third (i.e. charity) sector.

A commercial organisation must be able to show that it has adequate procedures in place to prevent bribery being committed on its behalf.

The law applies to bribes in the UK. The law also applies to bribes abroad if the person is resident or incorporated in the UK. It applies to the conduct of overseas agents and employees if the corporate is registered in or trades in the UK. The maximum penalty is 10 years imprisonment, and/or an unlimited fine.

1.1 Board Statement - Directors

ALB Brickwork Ltd fully supports & endorses the following statement: - *"Transparency is a first line of defense against corruption. Through transparency, organisations can communicate to stakeholders and the public their values and policies and how they are being translated into action. Transparency sets a tone of openness, accessibility and accountability, building confidence among stakeholders that they are treated in an equitable and responsible manner. Transparency of commitment to values and openness about policies and processes will not only enhance a company's reputation but act as a substantial deterrent to those wishing to act corruptly."* [Huguette Labelle, Chair Transparency International (October 2009) (the global civil society leading the fight against corruption)].

Following the Guidance issued by Transparency International UK (July 2010) the Anti- Bribery & Corruption Policy of ALB Brickwork Ltd can be summarised as: -

“ALB Brickwork Ltd has a zero tolerance of bribery & corruption. This policy extends to all the company’s business dealings and transactions. This policy is given force in a detailed anti-bribery programme which is regularly revised to capture changes in law, reputation demands and changes in the business. All directors and employees are required to comply with this policy.”

The Directors have made the following statement: -

“ALB Brickwork Ltd has established a culture in which bribery is never acceptable and has ensured that there is an effectively designed and implemented programme to counter bribery. The Company understands the importance of setting the right culture from the very top of the company and embedding the correct set of values throughout the business. The Company also understands its responsibility to ensure that management, employees and any relevant external stakeholders are aware of its policy and its zero tolerance of bribery. This statement underscores the anti-bribery culture that the Board expects and the consequences of breaching the provisions of the programme.”

ALB Brickwork Ltd is fully committed to ensuring that it operates to the highest standards of integrity and honesty in all areas of activity.

1.2 What is meant by Bribery & Corruption?

ALB Brickwork Ltd defines bribery and corruption in accordance with the following definitions from *Transparency International*: -

Bribery: - *“The offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action which is illegal, unethical or a breach of trust. Inducements can take the form of gifts, loans, fees, rewards or other advantages (taxes, services, donations, etc.).”*

Corruption: - *“The abuse of entrusted power for private in.”*

Facilitation Payments: - *“A small bribe, also called a “facilitating”, “speed” or “grease” payment; made to secure or expedite the performance of a routine or necessary action to which the payer has legal or other entitlement.”*

1.3 Purpose

The purpose of this policy is to set out the core requirements ALB Brickwork Ltd must follow in order to comply with the company’s expectations and the anti-bribery and corruption legislation. This policy should form the basis of policy and procedures throughout the company.

1.4 Scope

This policy reflects the statutory requirements of all the jurisdictions that the Company operates in

and sets the minimum acceptable standard of compliance. It addresses all inducements/rewards/corrupt payments/bribes. Such payments or inducements are regarded as those that are not and, would not, be authorised by ALB Brickwork Ltd in the ordinary course of business and would fall outside the definition of an acceptable gift.

This **policy applies to all businesses** and to **all staff**. **There are no exceptions.**

Infringement of this policy may have serious implications for the reputation of ALB Brickwork Ltd, including the possibility that criminal or civil penalties may be levied.

Non-compliance with this policy may result in disciplinary and/or criminal proceedings against the individual members of staff responsible.

2. Policy Statement

ALB Brickwork Ltd believes that business success should depend on a fair and open assessment of our products and services rather than being partly or wholly reliant on bribes, or other inducements.

ALB Brickwork Ltd is committed to ensuring a risk-based approach to assessing business risk and implementing processes, procedures and controls to monitor bribery and corruption risk and to ensure robust ethical management.

It is ALB Brickwork Ltd policy to ensure that all staff comply with all legislation designed to combat bribery and corruption in the jurisdictions in which they operate.

The Directors within ALB Brickwork Ltd are responsible for the risk-based approach and must be fully engaged in the decision-making processes regarding appropriate controls to mitigate the risk of bribery and corruption within their business operations.

A handwritten signature in black ink, enclosed within a circular outline.

Managing Director

Date: 02/01/2026

Next Review: 01/01/2027