

BRIBERY POLICY

Drainline Southern Ltd (The Company) Policy to comply with all laws, rules, and regulations governing anti bribery and corruption law, in all the countries where we operate. The Company has a zero-tolerance approach to acts of Bribery and corruption, by employees or anyone acting on our behalf. Any breach of this policy will be regarded as a serious matter by the Company of which is likely to result in disciplinary action and will be reported to the Police.

This means that the Company and its employees will never seek, accept or give a bribe, facilitation payment, kickback or any other improper payment. We must also always ensure that we operate with appropriate transparency in all our business dealings

The business will review its process following the guidance under the Bribery Act 2010 focusing on four key areas:

1. bribing another person (section 1)
2. being bribed (section 2)
3. bribing a foreign public official (section 6)
4. failure by a commercial organisation to prevent bribery (section 7)

Who is covered by the policy?

This policy applies to all individuals working at all levels and grades, including senior managers, directors, employees (whether permanent, fixed term or temporary), consultants, contractors, and any other person providing services to us. Drainline Southern complies with applicable legislation, including the Fraud Act 2006, the Bribery Act 2010 and with other regulatory requirements.

What is a bribe?

Bribes can take on many different shapes and forms, but typically they involve corrupt intent. There will usually be a '*quid pro quo*' – both parties will benefit.

- A bribe is a financial or other advantage offered or given:
- to anyone to persuade them to or reward them for performing their duties improperly or;
- to any public official with the intention of influencing the official in the performance of his / her duties.

Risk and Internal Control Systems

Drainline will seek to assess the nature and extent of its exposure to the risks of internal and external fraud, bribery, and corruption. It will review these risks periodically, using information on actual or suspected instances of fraud, bribery, and corruption to inform its review.

Drainline will seek to put in place efficient and effective systems, procedures, and internal controls to: encourage an anti-fraud culture; prevent and detect fraud, bribery, and corruption; and reduce the risks to an acceptable level.

Drainline will make all those receiving company funds or representing the company, including its suppliers, grant recipients, partners, contractors, trustees, and agents aware of this policy.

When appropriate, Drainline will work with relevant stakeholders, including comparable organisations, relevant regulators, and government organisations to tackle fraud.

Drainline will regularly review and evaluate the effectiveness of its systems, procedures, and internal controls for managing the risk of fraud. It will do this through risk management and assurance processes and audit arrangements.

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Gifts and Hospitality

This policy does not prohibit giving and receiving promotional gifts of low value and normal and appropriate hospitality. However, in certain circumstances gifts and hospitality may amount to bribery and all employees must comply strictly with policy in respect of gifts and hospitality. We will not provide gifts or hospitality with the intention of persuading anyone to act improperly or to influence a public official in the performance of his duties.

Facilitation payments, kickbacks & donations

We do not make, and will not accept, facilitation payments or “kickbacks” of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. Kickbacks are typically payments made in return for a business favour or advantage. All employees must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us. We do not make contributions of any kind to political parties. No charitable donations will be made for the purpose of gaining any commercial advantage.

Competition law

Drainline has a responsibility and a legal obligation to adhere to the Competition Act 1998 and the Enterprise Act 2002. Drainline will follow competition law and ensure staff have the knowledge and understanding to do that. Staff are made aware that failure to adhere to their company’s competition law policy could result in large fines and criminal charges against individual employees and the company.

Employees must report any activity, transaction or dealing which they suspect may infringe upon competition law to the SHEQ Director. They must also report all contact with competitors where there was any discussion of contracts, competitors, suppliers, sub-contractors, or other relevant external bodies to the reporting Director. Further, they should avoid all discussion of competition or competitive subjects with personnel from a competitor and make an obvious and clear action of breaking off such discussions should they arise.

Anti-competitive behaviours

There are 3 main types of anti-competitive behaviours in labour markets (which are all examples of business cartels)

No-poaching agreements.

No-poaching agreements occur when 2 or more businesses agree not to approach or hire each other’s employees (or not to do so without the other employer’s consent).

Wage-fixing agreements.

Wage-fixing agreements occur when 2 or more businesses agree to fix employees’ pay or other employee benefits. This includes agreeing the same wage rates or setting maximum caps on pay.

Businesses, legal advisers, and recruiters can follow these steps:

- understand how competition law applies to no-poaching and wage-fixing agreements
- don’t agree with a competitor to fix wages
- don’t agree with a competitor not to approach or hire each other’s employees
- don’t share sensitive information about your business or employees with a competitor
- provide recruitment staff with training on competition law and how it applies in the recruitment context
- ensure solid internal reporting processes are in place, and that staff are aware of these and how they can use them

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Reporting anti-competitive behaviour

CMA will investigate businesses in all sectors if there are reasonable grounds to suspect the law is being broken, such that fair competition when recruiting and retaining talent is being undermined.

CMA can be contacted on 020 3738 6888 or email: cartelshotline@cma.gov.uk

The process of reporting such concerns will be a completely confidential process.

Reporting – Raising Concerns

Employees will be encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. No employee will suffer any detriment as a result of raising genuine concerns about bribery, even if they turn out to be mistaken.

All staff must immediately report any suspected or actual instances of fraud, bribery or corruption. This includes offers to pay bribes, solicitation of bribes and demands to make facilitation payments. Failure to report could result in disciplinary action.

Reports should be made to the Finance Director (or the MD if the concern relates to the FD). If staff are not comfortable reporting their concerns to these people, they should contact their line manager. In the event of a report being made to the FD, they will inform the MD within 48 hours. The FD, together with the MD, will decide on the appropriate course of action to be taken.

Drainline also requires all those receiving company funds or representing the company, including its suppliers, grant recipients, partners, contractors, trustees and agents to report any suspected or actual instances of fraud, bribery or corruption involving, without limitation, the company's assets or staff.

Drainline will not penalise anyone for raising a concern in good faith, even if it turns out to be unfounded. Any member of staff who harasses or victimises someone for raising a concern in good faith will themselves be subject to disciplinary and/or legal action.

Drainline will maintain a system for recording: all reports of actual or suspected fraud, bribery and corruption; the action taken; and the outcome of any investigation. It will use this information to inform its review of the risks and the effectiveness of its controls.

Reference should also be made to the Drainline Whistleblowing Policy which provides alternative guidance on confidential reporting, escalation, and impartial advice from Protect (<https://www.protect-advice.org.uk/>).

Training and Communication

Anti-Bribery training will be provided to specific key members of staff and an online training module will be available to all staff. This policy will also be communicated at induction and on the business notice boards. Our zero-tolerance approach to bribery and corruption should be communicated to all suppliers, contractors, and business partners.

Who Is responsible for this policy?

The Managing Director has overall responsibility for ensuring that this policy complies with our legal and ethical obligations, and that all those under the business control comply with it. The SHEQ Director has primary and day-to-day responsibility for implementing this policy, for monitoring its use and effectiveness and dealing with any queries on its interpretation.

Monitoring and Review

The SHEQ department will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy, and effectiveness. Any improvements identified will be

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made as soon as possible. All workers are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

Staff are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions, and queries should be addressed to the SHEQ department.

Name: Tristan Miles

Signed:

A handwritten signature in black ink, appearing to read 'Tristan Miles', written over a horizontal line.

Appointment: Managing Director

Date: 1st September 2024

Next Review Date: 1st September 2025

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