



## Anti-Bribery Policy

This policy applies to senior management and all employees of Atlantix Construction Ltd. We operate our business with integrity and all of our employees shall work together to ensure that we remain untainted by bribery or corruption.

It is acknowledged that, under the Bribery Act 2010, it is an offence for any person either to offer, promise or give a bribe, or request, agree to receive or accept a bribe, where the bribe is connected with improper conduct. The Act also hold organisations responsible for failing to implement adequate procedures to prevent such acts by those working for the organisation or on its behalf.

We are committed to maintaining the highest level of legal and ethical standards in the conduct of our business affairs and accordingly will:

- not sanction corrupt behaviour in any circumstances;
- not engage in bribery in any of our activities;
- not tolerate the acceptance of bribes in any of our activities;
- apply restrictions to the giving and receiving of gifts and hospitality.

**Any breach of this policy will be regarded as a serious matter and will result in disciplinary action.**

We are committed to eradicating corruption and will support our employees in acting ethically.

The Managing Director has overall responsibility for this policy and managers have responsibility for its implementation within their section or site. Everyone in the company is responsible for reading and knowing the contents of this policy, for keeping full and accurate records of all cases where bribery is suspected and for reporting cases where they know, or have a reasonable suspicion, that bribery has occurred or is likely to occur.

Anyone discovering or suspecting corruption, whether by another staff member, a third party who represents our company, one of our suppliers or competitors, or anyone else, must report it to the Managing Director as soon as possible. Senior management will investigate all allegations of any breach of this policy, or any allegations of suspected corruption immediately and take all appropriate measures necessary to meet our legal obligations if a breach of the policy is discovered.

This policy will be brought to the attention of all representatives and other third parties who act on our behalf and they will be required to comply with its principles and obligations to the extent necessary to ensure that we remain untainted by bribery or corruption.

This policy will be reviewed annually as part of the company's standard policy review process or when any changes to legislation are introduced.

Signed  .....

Review Date: 1<sup>st</sup> January 2018

P Tolan  
Managing Director - Atlantix Construction Ltd