

ANTI BRIBERY POLICY STATEMENT

Bribery is a criminal offence and Forkers Ltd are committed to ensuring compliance with the Bribery Act 2010. The Board of Directors is determined to ensure full compliance with the Act and has appointed the Managing Director to be responsible for enforcing the policy. As part of its overall code of business conduct any transgressions will be dealt through the company's disciplinary procedures.

We do not, and will not, pay bribes or offer improper inducements to anyone for any purpose, nor do we, or will we, accept bribes or improper inducements. Using a third party as a conduit to channel bribes to others is a criminal offence and we do not, and will not, engage indirectly in or otherwise encourage bribery. We are committed to the prevention, deterrence and detection of bribery and have zero-tolerance towards bribery. We aim to maintain anti-bribery compliance as "business as usual", rather than as a one-off exercise.

Bribery - Is an inducement or reward offered, promised or provided to gain personal, commercial, regulatory or contractual advantage. It is unacceptable to:

- Give; promise to give, or offer a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given.
- Give, promise to give, or offer a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure.
- Accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them.
- Accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return.
- Retaliate against or threaten a person who has refused to commit a bribery offence or who has raised concerns under this policy.
- Engage in activity in breach of this policy.

Objective and Scope - This policy provides a coherent and consistent framework to enable Forkers Ltd employees to understand and implement arrangements enabling compliance. In conjunction with related policies and key documents it will also enable employees to identify and effectively report a potential breach.

We require that all staff, including those permanently employed, temporary staff, contractors and consultants:

- To act honestly and with integrity at all times and to safeguard the organisation's resources for which they are responsible.
- To comply with the spirit, as well as the letter, of the laws and regulations of all jurisdictions in which Forkers Ltd operates, in respect of the lawful and responsible conduct of activities.
- This policy applies to all of the activities undertaken by the Company.
- For partners, clients, joint ventures, subcontractors and suppliers, we will seek to promote the adoption of the principles set out in this policy.
- Within the Company, the responsibility to control the risk of bribery occurring resides at all levels of employees and includes/covers all staff at all levels.

The Company commits to:

- Setting out a clear anti-bribery policy and keeping it up to date.
- A fair vetting/assessment/selection process of suppliers/service providers.
- Auditing contracts and ensuring a clear audit trail is maintained.
- Monitoring expenditure approval processes.
- Ensuring the approval and recording of all hospitality or gifts.
- Making all employees aware of their responsibilities to adhere strictly to this policy at all times.
- Training all employees to recognise and avoid the use of bribery by themselves and others.
- Encouraging employees to be vigilant and report any suspicion of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately.
- Rigorously investigate instances of alleged bribery and assisting police and other appropriate authorities in any resultant prosecution.
- Taking firm and vigorous action against any individual(s) involved in bribery.
- Include appropriate clauses in contracts to prevent bribery.
- Random checks will be made on a percentage of all hospitality and gifts.

FORKERS LIMITED

(INCLUDING FORKERS SCOTLAND LTD, FORKERS RENEWABLE ENERGY LTD,
MINI-PILING & DRILLING LTD, P FORKER PLANT HIRE LTD)

Forkers Ltd

Facilitation payments - Facilitation payments are not tolerated and are illegal. Facilitation payments are unofficial payments made to public officials in order to secure or expedite actions.

Gifts and hospitality - Our policy makes it clear that:

- Sample tokens of modest value bearing the name or insignia of the organisation giving them (for example, pens, diaries or calendars) whether given personally, or received in the post, may be retained unless they could be regarded as an inducement or reward.
- You should refuse the offer or invitation (or return the gift) unless your Line Manager has advised you that it may be accepted or retained.
- Bona fide hospitality and promotional, or other business expenditure which seeks to improve the image of the organisation, better to present products and services, or establish cordial relations, is recognised as an established and important part of doing business and it is not the intention of this policy to prevent such behaviour.
- The Company does not intend to prohibit reasonable and proportionate hospitality and promotional or other similar business expenditure intended for these purposes.

Staff responsibilities - The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for the Company or under its control and all staff are required to avoid any activity that breaches this policy.

You must:

- Ensure that you read, understand and comply with this policy.
- Raise concerns as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

As well as the possibility of civil and criminal prosecution, staff that breach this policy will face disciplinary action, which could result in summary dismissal for gross misconduct.

Raising a concern

This Company is committed to ensuring that all of us have a safe, reliable, and confidential way of reporting any suspicious activity. We want each and every member of staff to know how they can raise concerns.

We all have a responsibility to help detect, prevent and report instances of bribery. If you have a concern regarding a suspected instance of bribery or corruption, please speak up – your information and assistance will help. The sooner you act, the sooner it can be resolved.

Preferably the disclosure will be made and resolved internally (e.g. to your Line Manager/Director or should you prefer the Managing Director). Concerns can be anonymous. In the event that an incident of bribery, corruption, or wrongdoing is reported, we will act as soon as possible to evaluate the situation.

Staff who refuse to accept or offer a bribe, or those who raise concerns or report wrong doing can understandably be worried about the repercussions. We aim to encourage openness and will support anyone who raises a genuine concern in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring nobody suffers detrimental treatment through refusing to take part in bribery or corruption, or because of reporting a concern in good faith.

If you have any questions about these procedures, please contact the Managing Director.



D Cartwright, Construction Director

1st January 2024