

Anti-Bribery and Ethical Business Policy

Prepared on: 04 January 2019

Last Review: 4th March 2025

To be reviewed on: 4th March 2026

Prepared by: Ralph Elliott-King

Approved on behalf of Marisco South Ltd and Marisco Electricals Ltd by:



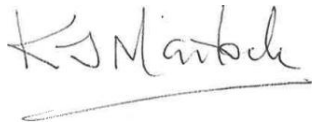
Samuel R Clover



Samuel Woodhams

Both On 4th March 2025

Reviewed and accepted on behalf of the Company by:



On: 4th March 2025

Ken Mantock - Operations Manager

This policy supersedes and replaces any previously published Anti-Bribery and Ethical Business Policy.

Preface

1. Marisco South Ltd and Marisco Electricals Ltd ("the Company") are committed to the practice of responsible corporate behaviour and to complying with all laws, regulations and other requirements which govern the conduct of our operations.
2. The Company is fully committed to instilling a strong anti-corruption culture and is fully committed to compliance with all anti-bribery and anti-corruption legislation including, but not limited to, the Bribery Act 2010 ("the Act") and ensures that no bribes or other corrupt payments, inducements or similar are made, offered, sought or obtained by us or anyone working on our behalf.

Bribery

3. Bribery is defined as the giving or promising of a financial or other advantage to another party where that advantage is intended to induce the other party to perform a particular function improperly, to reward them for the same, or where the acceptance of that advantage is in itself improper conduct.

4. Bribery is also deemed to take place if any party requests or agrees to receive a financial or other advantage from another party where that advantage is intended to induce that party to perform a particular function improperly, where the acceptance of that advantage is in itself improper conduct, or where that party acts improperly in anticipation of such advantage.
5. Bribery of a foreign official is defined as the giving or promising of a financial or other advantage intended to influence the official to obtain business or an advantage in the conduct of business unless the foreign official is required or permitted by law to be influenced by such advantage.

Consequences of Bribery

6. If the Company, or any associated person is found guilty of bribery under the Act, the directors, employees and associated people involved may face criminal prosecution.
7. For directors and other employees of the Company, failure to comply with this Policy or the Act will result in:
 - a. disciplinary action that may lead to their dismissal; and
 - b. facing the prospect of criminal prosecution under the Act, which will be expensive to defend and may result in suffering personal fines and/or imprisonment for up to 10 years.
8. For the Company, any breach of this Policy by any employee or business associate may result in the Company:
 - a. being prosecuted under the Act;
 - b. finding it hard to obtain future insurance cover and suffer increased premiums;
 - c. being excluded from tendering for many corporate and public tenders; and
 - d. suffering negative publicity and further associated damage as a result of such a breach.

Responsibility for Compliance and Scope of Policy

9. This Policy applies to all employees, agents, contractors, subcontractors, consultants, business partners and any other parties (including individuals, partnerships and bodies corporate) associated with the Company or any of its subsidiaries.
10. It is the responsibility of all parties in Section 9 to ensure that bribery is prevented, detected and reported and all such reports should be made in accordance with this Policy, as appropriate.
11. No party described in section 9 may:
 - a. give or promise any financial or other advantage to another party (or use a third party to do the same) on the Company's behalf where that advantage is intended to induce the other party to perform a particular function improperly, to reward them for the same, or where the acceptance of that advantage will in itself constitute improper conduct;
 - b. request or agree to receive any financial or other advantage from another party where that advantage is intended to induce the improper performance of a particular function, where the acceptance of that advantage will in itself constitute improper conduct, or where the recipient intends to act improperly in anticipation of such an advantage.

12. Parties described in Section 9 must:

- a. be aware and alert at all times of all bribery risks as described in this Policy;
- b. exercise due diligence at all times when dealing with third parties on behalf of the Company; and
- c. report all concerns relating to bribery or corruption to the directors.

Facilitation Payments

13. A facilitation payment is defined as a small payment made to officials in order to ensure or speed up the performance of routine or necessary functions.
14. Facilitation payments constitute bribes and may not be received or offered at any time irrespective of prevailing business customs in certain sectors of the construction trade.

Gifts and Hospitality

15. The receiving and giving of gifts and hospitality may remain a legitimate part of conducting business, but even the most inconsequential gift or incidental hospitality always comes with the potential to be viewed as a breach of this Policy and the Act.
16. Excessive gifts and hospitality will always be seen as contravening this Policy and possibly the Act. Care and due diligence should therefore be exercised at all times when giving or receiving any form of gift or hospitality on behalf of the Company.

The following general principles apply:

17. Gifts and hospitality may neither be given nor received as rewards, inducements or encouragement for preferential treatment or inappropriate or dishonest conduct.
18. Neither gifts nor hospitality should be actively sought or encouraged from any party, nor should the impression be given that the award of any business, custom, contract or similar will be in any way conditional on gifts or hospitality.
19. Cash should be neither given nor received as a gift under any circumstances.
20. Accepting or offering gifts and hospitality to or from relevant parties are strictly prohibited at the time of contracts being tendered or awarded.
21. The value of all gifts and hospitality, whether given or received, should be proportionate to the matter to which they relate and should not be unusually high or generous when compared to prevailing practices in our industry or sector.
22. All gifts and hospitality, whether given or received, must be recorded in the Hospitality & Gifts Register maintained at head office.

Charitable Donations

23. Charitable donations are permitted only to registered (non-profit) charities. No charitable donations may be given to any organisation which is not a registered charity.
24. All charitable donations must be fully recorded in the Charity Donations Register kept at head office.
25. Proof of receipt of all charitable donations must be obtained from the recipient organisation.
26. Under no circumstances may charitable donations be made in cash.
27. No charitable donation may be made at the request of any party where that donation may result in improper conduct.

Political Donations

28. The Company does not make political donations and the Company is not affiliated with any political party, independent candidate, or with any other organisation whose activities are primarily political.
29. Employees and other associated parties can make personal donations provided such payments are not purported to be made on behalf of the Company and are not made to obtain any form of advantage in any business transaction.

Due Diligence and Risks

30. The following issues should be considered with care in any and all transactions, dealings with officials, and other business matters concerning third parties:
 - a. The payment of cash for normal services rendered by the Company should be avoided where possible. The preferred method of payment is either cheques or direct transfer of funds to our business bank account that create a traceable paper audit trail for business transactions;
 - b. Any cash payment received exceeding £10,000 must be reported to the accounts department immediately for reporting to the authorities under the Money Laundering Regulations.
 - c. Employees should not prefer suppliers that offer off-book incentives such as gift coupons, pre-paid spending cards or other similar incentives for personal consumption. Such incentives are considered to be in contravention of this Policy and too easily construed as breaching the Act as they are effectively back-door financial inducements to individuals in charge of procurement to continue using a particular supplier for personal gain.

Ethical Business

31. Principles outlined in Marisco South's *Conduct of Business Policy* include acting with integrity and honesty at all times, taking reasonable care to organise and control affairs responsibly and effectively, with adequate risk management systems in place. We observe proper standards of market conduct and manage any conflicts of interest fairly.
32. We exist to create value for our clients and their customers by putting them first. In acting as a *Trusted Partner* to a large and diverse client base, we look after their best interests, invest time in understanding client needs, and communicate information in a way that is clear, fair and not misleading.

33. Our aim is that our customers have easy, reassuring, human experiences with us where we get things right first time. We ensure our actions will stand up to public scrutiny at all times and take a proactive and positive approach to customer feedback.
34. We recognise that we have a duty of care to our customers, and that this includes some of the most vulnerable in our society. We protect the rights of all customers and have robust policies and training in place for all customer-facing roles, with the aim that colleagues build advocacy with our clients and customers so that they would recommend Marisco South to others.
35. Marisco South colleagues are competent in their fields and are vital to the continuing success of our business. In order to nurture existing talent and attract the best to join us, we provide a supportive environment, with career progression opportunities, stretching talent programmes, senior leadership and sales development, and a strong reward offering.
36. We want all Marisco South colleagues to thrive in a supportive environment, protected by robust Human Resources policies, and we do not tolerate harassment or victimisation on any grounds. We have developed a strong culture of diversity and inclusion, demonstrated by our growing staff base.
37. We have a range of supporting policies in place to support the above principles including the following:
 - a. Human Rights Policy
 - b. Environmental Policy
 - c. Conduct of Business Policy
 - d. Anti-Bribery and Corruption Policy
 - e. Anti- Money Laundering Policy
 - f. Conflicts of Interest Policy
 - g. Whistleblowing Policy
 - h. Modern Slavery Policy
 - i. Diversity and Inclusion Policy
 - j. Customer Treatment Policy
 - k. Vulnerable Customers Policy
 - l. Corporate and Social Responsibility Policy

Governance

38. This Policy Statement applies to all employees and business divisions within the Marisco Group, regardless of geographic location.
39. This Policy Statement has been approved by the Marisco Group board of directors and will be reviewed and updated annually.