

## ANTI-BRIBERY & CORRUPTION POLICY

## Anti-bribery & Corruption Strategy

Capstone Construction is committed to the highest standards of ethical conduct and integrity in its business activities and drive a policy to prevent and prohibit bribery throughout the organisation. The company will not tolerate any form of bribery or corruption by, or of, its employees, agents, consultants or any other individual, group or company acting on behalf of our organisation.

## Statement of Intent

Further to the above strategy, and the need to ensure compliance with all relevant legislation, regulation, and best practices, Capstone Construction shall:

- Ensure the policy implemented throughout the organisation reflects the requirements of the Bribery Act 2010 and is proportionate to the risks faced by our business
- Ensure our senior directors & management team are both equipped and committed to implementing effective measures to prevent, monitor and eliminate any acts of bribery or corruption
- Assess the bribery risks that the company faces by carrying out research into the markets we operate within and clientele with whom we liaise
- Exercise due diligence whenever the company is represented either by an employee or by a third party through the use of background checks of such personnel
- Strive to prohibit our employees and associated persons from offering, promising, giving, soliciting, or accepting any bribe including cash, a gift or other inducement to, or from, any person or company, whether within the UK or overseas
- Issue company employees with a copy of the company policy during induction to the
  organisation, and, where necessary, re-issue if and when revisions of the document are
  made. This is to ensure clear communication of the expectations and requirements set upon
  our workforce
- Monitor and review the effectiveness of steps taken to control this risk at regular intervals to
  ensure compliance with legislation and appropriate to the business needs

Note- The circumstances of such corruption are often to gain personal or organisational benefits, the company is clear that in such circumstances, this behaviour will not be tolerated and will result in the appropriate disciplinary action and where necessary, dismissal and/or legal action.

To seek continual improvement, and assist in the implementation of this Policy, we will utilise external support as appropriate and seek advice on matters of this nature from our appointed competent personnel.

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Rhona Donnelly (Managing Director)