

CONTROL OF BRIBERY POLICY

Harringtons Builders PLC has a clear policy on Bribery; we support our employees and contractors to make decisions in line with our stated position. Our corporate conduct and that of our employees and contractors demonstrates a commitment to acting professionally, fairly and with integrity at all times. Harringtons Builders PLC does not and will not tolerate any form of bribery within its business. The purpose of this policy is to set out our employees and contractors' responsibilities in observing and upholding our position on bribery.

Harringtons Builders PLC is committed to operating responsibly wherever we work and to engage the social, environmental and ethical impact of our activities in the markets in which we operate. Our first principle in operating responsibly is with regard to 'integrity in corporate conduct', in that Harringtons Builders PLC does not engage in bribery or any form of unethical inducement or payment including facilitation payments and 'kickbacks'.

All employees are required to avoid any activities that may lead to, or suggest, a conflict of interests with the business of Harringtons Builders PLC. All employees and contractors must not accept, under any circumstances, any hospitality or gifts without first gaining the consent of a member of the Senior Management Team.

Harringtons Builders PLC will uphold laws relevant to countering bribery in all circumstances and in particular will comply with the Bribery Act 2010.

The Senior Management Team will ensure that any instance of bribery is identified within Harringtons Builders PLC and dealt with by taking appropriate remedial action immediately. A record will be made via any appropriate means and must be discussed as an agenda item at Management Review Meetings. Any failure to adhere to this would be classed as a non-conformance.

Harringtons Builders PLC will communicate this policy to employees and contractors through our established internal communication channels and briefing processes. Harringtons Builders PLC employees and contractors are encouraged to raise concerns in total confidence regarding any instance of malpractice to their immediate manager/supervisor at the earliest possible stage.

Harringtons Builders PLC will review the implementation of this policy in respect of its suitability, adequacy and effectiveness as and when necessary and make improvements as appropriate.

Endorsed by



SCOTT CARR
Director of Health, Safety & Environment
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