

## ANTI-BRIBERY AND CORRUPTION POLICY

Thames Reinforcements are committed to ensuring that its business is conducted according to ethical, professional and legal standards in a fair, honest and open manner. We will endeavour to ensure that this is reflected in every aspect of business that we undertake, so we bring integrity to all dealings.

Bribery and corruption exposes the Company, its employees and business partners to the risk of criminal prosecution in addition to harming the Company's reputation. Accordingly TRL operates a zero-tolerance of all forms of bribery and corruption. It is vital that we ensure that our employees and those who work on our behalf understand their responsibilities and operate to high ethical standards.

### What is Bribery?

Bribery is the offer, promise, giving, demanding or acceptance of an advantage in monetary or other form, as an inducement or reward for the improper performance of a function or activity which is expected to be performed in good faith, or impartially or by someone in a position of trust. Bribery is a criminal act.

Bribery can take many forms. It is not possible to provide an exhaustive list of examples of bribery or corruption which may be made directly or indirectly through a third party. However, some examples may include:

- The direct or indirect promise, offering or authorisation of anything of value
- The offer or receipt of any kickback, load, fee, reward or other advantage
- The giving of aid, donations or voting designed to exert improper influence
- Payments for lavish or inappropriate entertainment or travel
- Favours including offer of employment
- Facilitation payments
- Inflated commissions
- Fake consultancy agreements

### What is corruption?

Corruption is the misuse of power for gain.

### What is a kickback?

Kickbacks are a particular form of bribery. A kickback usually involves the return of a percentage of a sum of money already requested or received, typically as a result of pressure, coercion or a secret agreement. A kickback can be initiated and received by a corrupt individual, usually simultaneously with or after the completion of a business transaction.

### What is a Facilitation Payment?

This occurs when a person holding office, whether public or private, uses a position of strength (i.e. authority to perform a normal action or service) either with or without extortion to demand a bribe (for either carrying out what the person was appointed to do, to do it faster or to omit doing a required action) from the person

or enterprise needing the action performed (or omitted to be done), even though these payments may be small in absolute terms for the payer.

## Our principles

We prohibit the offer, gift, or acceptance of a bribe in any form, including kickbacks on any portion of a contract payment, facilitation payments or the use of other routes or channels to provide improper benefits to customers, agents, contractors, suppliers or employees of any such party or government officials. Whether extorted or not, facilitation payments are bribes and as such are also acquaintances.

We oppose all forms of bribery and corruption, large as well as small, whether initiated by corrupt officials or corrupt companies or individuals and whether it takes place in the public or private sector or in the UK or abroad.

This policy has been formally adopted by Thames Reinforcements Senior Management which is committed to preventing bribery and corruption. Its aim is to establish a culture within the Company and within our business partners in which bribery and corruption are never acceptable.

It is Senior Managements ultimate responsibility to oversee the development and implementation of the Company's Anti-Bribery and Corruption programme to ensure its effective implementation through the organisation to employees, subsidiaries and business partners.

Failure to comply with this policy may result in disciplinary action, including dismissal (employees), or appropriate sanctions (business partners) in addition to civil or criminal charges.

Signed.....*R May*.....Becky May (Commercial Director)

Dated.....15/12/2020.....