



ANTI-BRIBERY POLICY

It is the Policy of KAMM Civil Engineering Limited (KAMM) to ensure that our business is conducted according to ethical, professional and legal standards in a fair, honest and open manner.

The Company has a zero tolerance approach to all forms of bribery which include:

- The direct or indirect promise, offering or authorisation of anything of value.
- The offer or receipt of any kickback, loan, 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 offers of employment.
- Facilitation payments.
- Inflated commissions.
- Fake consultancy agreements.

KAMM opposes all forms of bribery, large as well as small, whether by corrupt officials or corrupt companies or individuals, and whether it takes place in the public or private sector, in the UK or abroad. To adhere to the policy, we will:

- Ensure all Company personnel are provided with training on the policy on antibribery and corruption so they can recognise the signs and take steps to avoid it.
- Encourage employees, subcontractors and business partners to report any suspicions of bribery and/or corruption through formal 'whistle blowing' channels or more informally through our 'open door' policy which enables any individuals to discuss any concerns they may have with senior management in a confidential environment.
- Have an understanding of how bribery may occur during our operations and the impacts this could have, implementing appropriate control measures as necessary to prevent occurrence.
- Use appropriate disciplinary and other sanctions for violations of the policy and/or laws against bribery and corruption.
- Failure to comply with this policy may result in disciplinary action, including dismissal or appropriate sanctions, in addition to civil and criminal charges.
- Constantly monitor and regularly review this Anti-Bribery Policy in order to ensure its continuing suitability.
- Undertake monitoring of employee expenses records to ascertain any anomalies which may fall into the scope of this Policy.
- Ensure that this Anti-Bribery Policy Statement is available to all employees.

A handwritten signature in black ink, appearing to read 'Adam McCormack', written over a dotted line.

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Adam McCormack
Director
1st January 2024

A handwritten signature in black ink, appearing to read 'Keith McWilliams', written over a dotted line.

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Keith McWilliams
Director
1st January 2024