

BELVIN

CONSTRUCTION

ANTI-BRIBERY & CORRUPTION POLICY

1.0 Purpose

This anti-bribery policy exists to set out the responsibilities of Belvin Construction Limited and those who work for us in regard to observing and upholding our zero-tolerance position on bribery and corruption.

2.0 Policy Statement

Belvin Construction Limited is committed to conducting business in an ethical and honest manner and is committed to implementing systems that ensure bribery is prevented.

Belvin Construction Limited will uphold all laws relating to anti-bribery and corruption and note that we are bound by the laws of England and Wales, including the Bribery Act 2010.

Belvin Construction Limited recognises that bribery and corruption are punishable by up to ten years imprisonment and a fine.

3.0 Scope

The policy applies to all Belvin Construction's stakeholders including all employees, customers, subcontractors, consultants and any third party.

4.0 Definition of Bribery

Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an act or decision.

Bribery refers to any inducement, reward, or object/item of value offered to another individual in order to gain commercial, contractual, regulatory or personal advantage.

Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law.

Bribery is illegal. Stakeholders must not engage in any form of bribery, whether it be directly, passively or through a third party.

5.0 Types of Bribery

There are four areas of bribery as follows:

5.1 Gifts & Hospitality

Belvin Construction Limited accepts normal and appropriate gestures of hospitality and goodwill so long as the giving or receiving of gifts meets the following requirements:

- It is not made with the intention of influencing the party to whom it is being given or to gain a business advantage.
- It is not made with the suggestion that a return favour is expected.
- It is compliant with the law.
- It is given in the name of the company.
- It does not include cash or cash equivalent.
- It is appropriate in the circumstances and is of appropriate type/value.

Gifts should be declared to the Directors.

5.2 Facilitation Payments & Kickbacks

Belvin Construction Limited does not accept and will not make any form of facilitation payments of any nature or kickbacks to be made or accepted.

5.3 Political Contributions

Belvin Construction Limited will not make donations, whether in cash, kind or by any other means, to support any political parties or candidates. We recognise that this may be perceived as an attempt to gain an improper business advantage.

5.4 Charitable Contributions

Belvin Construction Limited accepts (and encourages) the act of donating to charities – whether through services, knowledge, time or direct financial contributions – and agrees to disclose all charitable contributions it makes.

Belvin Construction Limited will ensure that all charitable donations made are legal and ethical under local laws and practices, and that donations are not offered/made without the approval of the compliance manager.

6.0 Our Approach

6.1 Employee Responsibilities

As an employee of Belvin Construction Limited, you must ensure that you read, understand, and comply with the information contained within this policy, and with any training or other anti-bribery and corruption information you are given.

All employees and those under our control are equally responsible for the prevention, detection and reporting of bribery and other forms of corruption

If you have reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, you must notify the compliance manager.

If you breach this policy, you will face disciplinary action and could face dismissal for gross misconduct. Belvin Construction Limited has the right to terminate a contractual relationship with an employee if they breach this anti-bribery policy.

6.2 Raising a Concern

If you suspect that there is an instance of bribery or corrupt activities occurring in relation to Belvin Construction Limited, you are encouraged to raise your concerns at as early stage as possible.

Belvin Construction Limited will support anyone who raises concerns in good faith under this policy.

6.3 Record Keeping

Belvin Construction Limited will declare and keep a written record of the amount and reason for hospitality or gifts accepted and given, and understands that gifts and acts of hospitality are subject to managerial review.

6.4 Monitoring & Review

The Directors are responsible for monitoring the effectiveness of this policy and will review the implementation of it on a regular basis.

Name: Stephen Turner

Signature:



Position: Director

Date: 1.9.2026

Due for Review By: 1.9.2027