



Byrne Group is committed to promoting and maintaining the highest level of ethical standards in relation to all our business activities, and has implemented a policy to preserve and strengthen these values.

We have a zero-tolerance policy towards bribery and corruption, and are committed to acting fairly and with integrity in all our business dealings and relationships. We maintain and enforce effective systems to counter bribery.

Purpose and scope of the policy

Our policy sets out the Company's position on any form of bribery and corruption, and provides guidelines aimed at:

- Ensuring compliance with anti-bribery laws, rules and regulations, not just within the UK but in any other country within which the Company may carry out our business or in relation to which our business may be connected.
- Enabling employees and persons associated with the Company to understand the risks associated with bribery, and to encourage them to be vigilant and effectively recognise, prevent and report any wrongdoing, whether by themselves or others.
- Creating and maintaining a rigorous and effective framework for dealing with any suspected instances of bribery or corruption.
- Providing suitable and secure reporting and communication channels, ensuring that any information that is reported is properly investigated and effectively dealt with.
- Not being directly or indirectly involved in activities that violate human rights by operating within the international laws concerning labour practices, and recognising the fundamental rights at work.

Our policy applies to all permanent and temporary employees of the Company (including any intermediaries, subsidiaries or associated companies). It also applies to any individual or corporate entity associated with the Company who performs functions in relation to, or for and on behalf of, the Company, including, but not limited to, directors, agency workers, casual workers, contractors, consultants, seconded staff, agents, suppliers and sponsors ("associated persons").

All employees and "associated persons" are required to adhere to the principles set out in our policy, and generally to:

- Comply with any anti-bribery and corruption legislation that applies in any jurisdiction, in any part

of the world, in which they might be expected to conduct business.

- Act honestly, responsibly and with integrity.
- Safeguard and uphold the Company's core values by operating in an ethical, professional and lawful manner at all times.

The Company's rules, procedures and guidelines are set out in our full Anti-Bribery and Corruption Policy which is within our Employee Handbook.

Sanctions for breach

A breach of any of the provisions will constitute a disciplinary offence and will be dealt with in accordance with the Company's disciplinary procedure. A breach of the policy will be treated as gross misconduct and will render the employee liable to summary dismissal.

An alleged or suspected breach of our policy by "associated persons" will lead to the suspension of any relevant contract, subcontract or other agreement whilst the matter is being investigated. If proven, the relevant contract, subcontract or other agreement will be terminated.

Monitoring Compliance

The Company Compliance Manager has lead responsibility for ensuring compliance with our policy, and will review its contents on a regular basis. This includes responsibility for monitoring its effectiveness and for the provision of regular reports in this regard to the Directors of the Company, who have overall responsibility for ensuring that our policy complies with the Company's legal and ethical obligations.

Training

The Company will provide training to all employees to help them understand their duties and responsibilities under our policy. The Company's zero tolerance approach to bribery will also be communicated to all business partners at the onset of the business relationship, and as appropriate thereafter.

Signed:

Michael Byrne

Chief Executive, Byrne Group

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