MD Group

Anti-bribery Policy

Policy objectives

The objective of this Policy is not to prohibit the giving or receiving of reasonable and proportionate gifts and hospitality.

However, employees must declare and keep a record of hospitality or gifts accepted or offered, which will be subject to managerial review to ensure they are fully compliant with the policy.

Introduction

MD Building Services Ltd is committed to delivering services and carrying out its business operations in an ethical, open and transparent manner. We have always worked hard to build a longstanding and unquestionable reputation for our positive behaviour and integrity. This reputation is based on our zero-tolerance approach to any questionable behaviour which may place in doubt the company's values and conduct.

As well as the conduct or our own employees, this policy is also applicable to third parties that provide works and services on our behalf such as: customers and their employees and subcontract and supply chain partners. We expect those parties and adhere to, or provide, equivalent policies and procedures in relation to tackling issues of bribery and corruption within the workplace.

The Policy

MD Building Services Ltd does not tolerate **any form** of bribery or corruption. No person who comes under the scope of the policy must offer, to pay, make, seek or accept a personal payment, gift or favour in return for favourable treatment or to gain any business advantage. It is a criminal offence to do so.

All business activities undertaken by the Company must adhere to, and comply with, any government legislation set out (The UK Anti Bribery Act 2010). All subsequent revisions of legislation must be complied with. The Company will take firm action against any individuals or other parties that it discovers are involved in bribery.

Any breach of the Policy by employees will result in disciplinary action under the Gross Misconduct provisions of the Group's Disciplinary and Dismissal Procedures which can include the sanction of summary dismissal in any case where an employee has been found to have paid or received a bribe.

The guideline below set out the company's clear and unequivocal stance with regard to bribery and the acceptance of gifts from colleagues, clients or third parties.

Employees and representatives of the company **shall not**:

- Offer, promise or pay bribes;
- Request, agree to or accept bribes;
- Make payments to someone (or favour then in any other way) if they know that it will involve someone in misuse of their position (or them performing their functions improperly);
- Misuse their position (or perform your functions improperly) in connection with payments (or other favours) for themselves or others;
- Deliberately use advantages to try to influence public officials for business reasons.

Further guidance may be obtained by referring to the UK Anti Bribery Act 2010.

POLICY PROCEDURES

Communication
We will communicate this policy and relevant guidance to employees across the Group, through our established internal communication channels. We will also communicate this policy to our suppliers, contractors and business partners and wider stakeholders.

Training
We will ensure that those within the scope of the policy receive training appropriate to their activities and the associated risks.

Data retention
We will maintain adequate books and records which properly and fairly document all financial transactions. We will maintain written evidence to record compliance with this policy.

Audit
Our internal control systems will be subject to regular internal and independent audit to provide assurance that they are effective in countering bribery and corruption.

Business relationships
We will ensure that our business partners – including contractors, suppliers, agents, brokers and joint venture partners – are fit to do business with.

Supply chain
We will address bribery and corruption risk in our supply chain, for example by ensuring that payments made for goods and services are reasonable.

Conflicts of interest
We will address conflicts of interest and the risks created by gifts and hospitality through the implementation of our internal policies.

Whistle Blowing
Understandably, employees may be worried about raising these types of issues and may consider keeping these concerns to themselves. If an employee raises a genuine concern under this policy, we will ensure that they will not be at risk of losing their job or suffering any form of retribution as a result.

We understand employees may wish to raise a concern in confidence, if we are asked to protect the person's identity we will not disclose their identity without prior consent.

Raising a concern internally
If an employee has a concern we hope they would normally be able to raise this with their line manager either verbally or in writing.

If they feel they cannot raise the concern with their line manager or if it appears nothing is being done with regard to their concern they should contact the Managing Director.

If the channels above have been followed and the employee still has concerns or if they feel that the matter is so serious they are unable to discuss it with any of the individuals mentioned above they should contact the HR representative.

All concerns will be investigated and reviewed. This will involve a formal investigation and formal procedure and outcome.

Raising a concern externally

We would hope that the policy gives employees the assurance needed to raise matters internally however there may be circumstances when they may need advice or assistance prior to reporting any issues externally (i.e. regulators or Police).

Public Concern at Work (PCAW) are a free, confidential and practical helpline that provided practical advice if an employee is unsure of whether or how to raise a concern about danger or illegality that they have witnessed at work.

Helpline Number: 020 7404 6609
Or
helpline@pcaw.co.uk.

Monitoring and review

The Company is responsible for engaging Internal Audit to independently assess compliance with this policy.

An annual audit will be carried out annually on compliance with this policy to the Senior Management Teams, which will make an independent assessment of the adequacy of the policy and disclose any material non-compliance. The Company may also make an independent assessment of the adequacy of the policy in response to an event such as an instance of bribery.