



ANTI-BRIBERY POLICY

Business Scope

Provision of Civil, Electrical and Mechanical Services to the Commercial, Industrial and Public Sectors, within the UK. These services are coordinated through a head office complex and delivered in the field via skilled and trained operators. The laying of Asphalt Mixes by hand and machine in accordance with National Highways Sector Scheme 16.

General Statement of Intent

Northavon Group Limited, its employees and agents is / are required to comply without exception with this policy which embodies the principles and spirit of the Bribery Act 2010.

Northavon Group Limited prohibits either directly or indirectly:

the offering, giving, solicitation or the acceptance of any bribe, gift, loan or payment or reward, either in cash or any other form of inducement

- **To or from** any person or company, wherever they are situated and irrespective of whether they are a public or official body or private individual or company
- **By** any individual employee, agent or other person or body acting on behalf of Northavon Group Limited
- **In order** to gain any commercial, contractual or regulatory advantage for Northavon Group Limited in any manner which is or may reasonably be considered to be unethical
- **Or in order** to gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.

Further Clarification

Northavon Group Limited accepts that normal and acceptable business practices may vary between its clients and supply chain partners.

This policy prohibits any inducement between Northavon Group Limited personnel and any person which is intended to influence action which is not solely in the interests of Northavon Group Limited, the person or the organisation which they represent.

This policy is not intended to prohibit the following customs and practices provided that they constitute acceptable practice within a particular market, are proportionate and adequately recorded:

- Normal and appropriate hospitality
- The giving of a ceremonial gift on a festival or at another special time
- The offer of resources to assist the person or body to make the decision more efficiently, provided that they are provided solely for that purpose.

Deciding what is acceptable or otherwise may not always be straightforward and if anyone is in any doubt as to whether a certain circumstance, actual or potential, may constitute bribery, the matter should be referred to a Director of Northavon Group Limited before proceeding.

Employee Obligation

All employees of Northavon Group Limited are responsible for the prevention, identification and reporting of bribery. Employees or other individuals can report in absolute confidence any suspicion of bribery by emailing the Group Managing Director at mike.clancy@northavongroup.com.

This policy is related to and should be read in conjunction with the Northavon Group Ethical Procurement Policy.

This policy is reviewed and revised at regular intervals, not less than annually, to ensure that it is relevant, up to date and fit for purpose.

Signed:

Mike Clancy

Group Managing Director

9 January 2023