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ANTI-BRIBERY & CORRUPTION POLICY STATEMENT

The Bribery Act 2010 (Act) came into force on 1 July 2011. The Act is a consolidation and update of the UK's anti-bribery laws. The Government has also published guidance in association with the Act to explain its requirements and to assist business in implementing appropriate measures to manage bribery and corruption risk.

Bluestone Design & Construction Ltd is committed to ensuring that its business is conducted ethically and that its employees, sub-contractors, agents and all other parties conducting business for or on Bluestone's behalf carry out their duties and conduct themselves with integrity and honesty at all times.

We employ external accountants to monitor and investigate any discrepancies with finance, bribery or corruption compliance.

Bluestone will ensure that all suppliers and sub-contractors adopt and maintain the same principles.

1. Purpose

This Anti-Bribery and Corruption Policy is to promote ethical business practices and prevent bribery and corruption in all operations. The policy sets out our commitment to conducting business transparently, fairly and with integrity in all dealings with clients, suppliers, subcontractors and public officials.

2. Scope

This policy applies to all employees, subcontractors, suppliers and third parties working on our behalf. The policy also extends to all business activities and dealings, including tenders, contracts, procurement and interaction with public officials.

3. Policy Statement

Bluestone maintains a zero-tolerance approach to bribery and corruption. Employees and associated parties are strictly prohibited from offering, promising, giving or accepting any form of bribe, whether directly or indirectly. This includes any attempt to influence an individual or entity to act in a way that is improper or unethical in exchange for financial or other benefits.

4. Definitions

- **Bribery:** Offering, promising, giving, or accepting any financial or other advantage to induce or reward the improper performance of a function or activity.
- **Corruption:** The abuse of power for personal gain, including the manipulation of business dealings for dishonest or illegal purposes.

5. Examples of Prohibited Conduct

- Offering or receiving cash payments, gifts or entertainment in return for favourable treatment.
- Providing facilitation payments to expedite routine processes or secure business advantages.
- Influencing or attempting to influence any party through improper means to gain business contracts or approvals.
- Offering or receiving gifts or hospitality during a tendering process.

6. Gifts and Hospitality

Modest gifts and hospitality may be allowed, provided they:

- Are occasional, reasonable, and transparent.
- Are not intended to influence decision-making or gain an unfair advantage.
- Do not breach applicable laws or this policy.

Employees must declare all gifts and hospitality above a reasonable threshold (£50) to management for approval.

7. Facilitation Payments

Facilitation payments, often small unofficial payments made to speed up administrative processes, are strictly prohibited. Employees must refrain from making or accepting such payments and report any requests for them to management immediately.

8. Responsibilities

- **Management:** Responsible for promoting awareness of this policy and ensuring compliance. Management must also lead by example and ensure a culture of integrity.
- **Employees:** Required to understand, comply with and uphold the policy. Employees are encouraged to report any suspected bribery or corruption without fear of retaliation.
- **Third Parties:** Subcontractors, suppliers and agents are expected to adhere to the principles of this policy. Contracts must include anti-bribery clauses and due diligence must be performed before engaging with third parties.

9. Reporting and Whistleblowing

Employees and third parties who become aware of bribery or corruption are encouraged to report the matter immediately to management or a designated compliance officer. All reports will be treated confidentially, and retaliation against whistleblowers is strictly prohibited (please see HR.057 Close Call Prevention Intervention Policy for further detail).

10. Consequences of Non-Compliance

Any violation of this policy may result in disciplinary action, including termination of employment or contract. In cases where legal violations occur, the company will cooperate with law enforcement authorities and legal action may be taken against offenders.

11. Review and Updates

This policy will be reviewed annually or as needed to ensure compliance with applicable laws and regulations. Changes to the policy will be communicated to all employees and relevant third parties.



Richard Lee Molyneux



Lloyd Robert Medforth

1 April 2026



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Cert No 25219

Registered in England No. 5260313 VAT No. 854 4986 76