

ANTI BRIBERY POLICY

Introduction

Phoenix Brickwork (UK) Ltd is committed to the highest standards of ethical conduct and integrity in its business activities and as such, we will not tolerate any form of bribery, corruption or fraud within our Organisation or directed to any person within our Organisation.

Every employee and individual acting on the organisation's behalf is responsible for maintaining the organisation's reputation and for conducting company business honestly and professionally.

The Bribery Act 2012 came into force on 21st May 2013 and is largely based on the Bribery Act 2010 which came into force on 1st July 2011 and made it a criminal offence to offer, promise or accept a bribe.

All employees and associated persons are required to comply with this policy, in accordance with the Bribery Act 2012.

What is a bribe?

A bribe is a financial advantage or other reward that is offered to, given to, or received by an individual or company (whether directly or indirectly) to induce or influence that individual or company to perform public or corporate functions or duties improperly.

Employees and others acting for or on behalf of the organisation are strictly prohibited from making, soliciting or receiving any bribes or unauthorised payments.

As such you should not offer, promise, give, request, agree to receive, or accept any bribes:

- During the course of employment;
- When conducting company business; or
- When representing the organisation in any other capacity.

Competition Law Compliance

In addition to our commitment to preventing bribery and corruption, Phoenix Drywall (UK) Ltd is also dedicated to ensuring full compliance with UK competition law. Competition law is designed to promote fair competition and prevent anticompetitive practices. During the course of employment, when conducting company business, or when representing the organization in any capacity, employees and associated persons must refrain from engaging in any practices that could restrict competition, such as price-fixing, market allocation, bid rigging, or any other anticompetitive behaviour.

Procedure for offering or accepting gifts, hospitality etc.

Any gifts, rewards or entertainment received or offered from clients, public officials, suppliers or other business contacts should be reported immediately to the Managing Director or Company Secretary.

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In certain circumstances, it may not be appropriate to retain such gifts or be provided with the entertainment and employees and associated persons may be asked to return the gifts to the sender or refuse the entertainment, for example, where there could be a real or perceived conflict of interest. As a general rule, small tokens of appreciation, such as flowers or a bottle of wine, may be retained by employees.

If you wish to provide gifts to suppliers, clients or other business contacts, prior written approval must be obtained from the Managing Director, these will be authorised only in limited circumstances and must be proportionate, reasonable and made in good faith.

Reporting suspected bribery

You should report any concerns that you may have to the Managing Director or Company Secretary as soon as possible. Issues that should be reported include:

- any suspected or actual attempts at bribery;
- concerns that other employees or associated persons may be being bribed; or
- concerns that other employees or associated persons may be bribing third parties, such as clients or government officials.

In line with our whistle-blowing policy any person who reports instances of bribery or suspected bribery in good faith will be supported by the Company. We will take your concerns seriously and will ensure that you are not subjected to detrimental treatment as a consequence of your report. An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, you should not agree to remain silent.

Action by the Company

We will fully investigate any instances of alleged or suspected bribery, corruption or fraud. Employees suspected of bribery, corruption or fraud may be suspended from their duties while the investigation is being carried out. The Company will invoke its disciplinary procedures where any employee is suspected and proven allegations may result in a finding of gross misconduct and immediate dismissal.

Any instances of detrimental treatment by a fellow employee towards any person who raises their concerns will be treated as a disciplinary offence.

The Company may also report any matter to the relevant authorities, including the Director of Public Prosecutions, Serious Fraud Office, Revenue and Customs Prosecutions Office and the police. The Company will provide all necessary assistance to the relevant authorities in any subsequent prosecution.

Penalties

A breach of the organisation's anti-bribery policy by an employee will be treated as grounds for disciplinary action, which may result in a finding of gross misconduct, and immediate dismissal.

You should be aware that that bribery is a criminal offence that may result in up to 10 years' imprisonment and/or an unlimited monetary fine for the individual accepting, offering or attempting to cover up a bribe along with an unlimited fine for the organisation.

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Records

Accurate, detailed and up-to-date records of all corporate hospitality, entertainment or gifts accepted or offered must be kept.

If you are offered any gift or hospitality, you should report the matter to the Managing Director a record of all offers will be kept.

If you offer any gift or hospitality to any person, or organisation, you must first obtain permission from the Managing Director and again the offer must be properly recorded.

Risk management

The Company has established detailed risk management procedures to prevent, detect and prohibit bribery. The Company will conduct risk assessments on a regular basis and, where relevant, will identify employees or officers of the Company who are in positions where they may be exposed to bribery.

This statement will be reviewed annually or when there are changes to legislation or there is a significant change to the business activities. The Anti-Bribery Policy will be re-issued after the review, having been amended accordingly.

Signed:



Mr Christian Watson
Group Chairman

30th October 2025

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