

ANTI-BRIBERY POLICY – STATEMENT OF INTENT

Group Metropolitan Ltd always have and will continue to conduct business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption. We are committed to acting fairly and with integrity in all our dealings and relationships wherever we operate as well as implementing and enforcing effective systems to counter bribery.

This policy applies to all employees, contractors, subcontractors, suppliers, and any other business partners we are associated with.

Legal Obligations

This policy explains our commitment to adhering to the Bribery Act 2010 which came into effect 1st July 2011. The Bribery Act 2010 defines bribery as the act of offering a financial or other advantage to encourage improper behaviour or to reward someone for having already engaged in such misconduct. Improper performance, in this context, refers to a violation of the expectation that an individual will act in good faith, impartially, or in accordance with a position of trust.

The Act creates four specific offences:

- **Active Bribery:** To offer, promise or give a financial or other advantage to another person (i.e. bribe a person) whether within the UK or abroad, with the intention of inducing or rewarding improper conduct.
- **Pass Bribery:** To request, agree to receive or accept a financial or other advantage (i.e. receive a bribe) for or in relation to improper conduct.
- **Bribing Foreign Public Officials:** The Act explicitly prohibits the bribery of foreign public officials.
- **Failure to Prevent Bribery by Commercial Organisations:** Organisations can be held liable for failing to prevent bribery on their behalf. This includes situations where employees or associated individuals engage in bribery during business activities to secure or maintain business or gain a competitive advantage for the company.

It is important to note that employees can be personally criminally liable for these offences. Additionally, it is an offense for an employee or an associated person to engage in bribery during business activities, with the intent to secure or maintain business or gain an advantage for the company. In such cases, the company itself can also be held liable for failing to prevent bribery. Penalties for these offenses may include unlimited fines and substantial damage to the organisation's reputation.

Key Principles

- Bribery of any kind is strictly prohibited. Under no circumstances should any provision be made, money set aside, or accounts created for the purposes of facilitating the payment or receipt of a bribe. If in doubt as to what might amount to bribery or other unethical conduct or might constitute a breach of this policy, you should refer the matter to your Line Manger, Divisional Director or the HR Department.
- Gifts, Entertainment and Hospitality provided in the course of business must be reasonable, transparent and not intended to influence decision-making improperly. It is not acceptable to give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given, or to accept a payment, gift or hospitality from a third party that you know, or suspect is offered or provided with the expectation that it will obtain a business advantage for them.
- We will conduct due diligence on suppliers and contractors we work with to ensure they meet our ethical and anti-bribery standards.
- Any violations of this policy may result in disciplinary action, including summary dismissal for gross misconduct or termination of a contractual relationship. Legal action may also be pursued against those involved in bribery or corruption.

Risk Management

We will undertake risk management processes to prevent, detect and prohibit bribery. This includes:

- Continuously monitor and review our relationships with suppliers and contractors.
- Identify high risk areas of the business, such as tenders for work and high value projects.
- Ensure protection for whistleblowers from retaliation.
- The Board of Directors are actively engaged in overseeing and supporting our anti-bribery efforts.
- Undertake appropriate due diligence of third parties.

This Anti-Bribery Policy will be reviewed to ensure we are adhering to the law, regulations, and best business practices. We are committed to conducting business with integrity and transparency. We will not tolerate bribery or corruption in any form, and we expect all employees and stakeholders to share this commitment.

Graham Halls (Signed)
Managing Director

Date Reviewed: 22nd January 2026

Next Review Date: 22nd January 2028