

BRIBERY AND CORRUPTION POLICY

STEM Construction Ltd (STEM) are committed to conducting business with the utmost integrity and in accordance with the principles set out in the UK Bribery Act 2010.

STEM Construction Ltd expects its employees and business partners to respect and support the core values of trust, honesty, and integrity. The Company will not tolerate the offering, giving, receiving or acceptance of bribes in any form.

A bribe is a financial payment or other form of reward that is intended to induce or influence an individual, company or public body to perform their functions improperly. This may include showing partiality, acting in bad faith or acting in a way that is inconsistent with a position of trust.

Bribes, for the purpose of this Policy, include facilitation payments, kickbacks and any other reward, favour or payment designed to induce or influence the recipient to perform his or her functions improperly.

Hospitality designed to improve business relations which is proportionate to the circumstances and which is not for an improper purpose is not usually regarded as a bribe. This must be agreed with the Managing Director prior to acceptance.

No employee, agent, consultant or business intermediary acting for STEM may offer, give, request, receive or accept any bribes, whether directly or indirectly.

What does this mean for me?

- Any alleged or suspected incident of bribery will result in a formal investigation and may result in disciplinary action for any employee involved. Any activity or behaviour by an employee that is unlawful or prohibited by this policy will constitute gross misconduct and may result in dismissal. Employees may be suspended while investigations are carried out.
- Employees who engage or do business with third parties who act on behalf of STEM or represent STEM should ensure that this policy is drawn to their attention. STEM expects all its business partners to comply with this policy and with the applicable law relating to bribery.
- STEM reserves the right to terminate immediately any contract or business relationship with any agent, consultant, or other business intermediary where bribery has occurred.

Procedures to Mitigate Risk

- Training for employees and those working for or representing the Company in a business capacity.
- Written commitments from those we work with to engage with the principles in this policy.
- STEM will work with its business partners to develop and improve good practice and to seek to eliminate bribery and corruption. It will select business partners who have adopted similar policies and objectives and will avoid doing business with those who act unlawfully or in a way that is not consistent with ethical business principles.

Monitoring and Compliance

- The Managing Director will review procedures and will monitor their effectiveness.
- Designated individuals within each business area, together with the Managing Director have responsibility for the implementation and development of such procedures.
- All employees have an obligation to comply with this policy and support and promote its principles in their business function.
- Any employee who suspects that bribery has occurred or that there has been any other breach of this policy should report it so that it can be formally investigated.

Signed:

A handwritten signature in black ink, appearing to read "S Thornley", written over a horizontal line.

Date:

20/07/23

Stephen Thornley
Managing Director