

STAFF ANTI-BRIBERY POLICY

1. INTRODUCTION

Plowman Craven is a professional surveying consultancy, providing expert and innovative measurement services and advice, risk management and reassurance. Our core values are based on this vision, and to behaving with the highest personal, ethical and corporate standards.

Bribery has absolutely no place at Plowman Craven, and we do not tolerate any form of bribery, whether directly or indirectly through third parties. The Board and Directors are totally committed to this Policy. Individuals involved in bribery will be investigated and could face disciplinary action, including dismissal for gross misconduct.

2. BRIBERY ACT

Plowman Craven's excellent reputation is key to our success; being client-focused, we all have to act in accordance with our other core values of honesty, integrity and trust.

The Bribery Act 2010 came into force on 1st July 2011, replacing existing outdated legislation. There are four offences under the Act that companies could be prosecuted for:

- Paying bribes
- Receiving bribes
- Bribing a public official
- Failure of commercial organization to prevent bribery

As well as the company being liable for any of the above offences, senior staff can also be personally charged if they knew about, and did nothing to prevent, a bribe.

3. UNDERSTANDING AND RECOGNISING BRIBERY

It is a criminal offence to offer, promise, provide, request or accept a bribe and it is also illegal for companies to fail to prevent bribery. This legislation is not just confined to the UK – it applies wherever we work, even where bribery is endemic in that country's culture.

This policy applies to staff at Plowman Craven as well as all subcontractors, consultants and agents who supply services to us.

Bribery is giving someone

- a financial or other advantage
- to encourage that person to perform their functions or activities improperly
- or to reward that person for having already done so

Bribery could occur in tendering, appointing preferred suppliers, sub-contractors and agents. Bribes are not just payments in cash; gifts and hospitality can be bribes if they are intended to influence a business decision.

Always think of what you are providing/being offered in connection with your role. Question any arrangement that compromises your position, and keep all transactions open and transparent.

4. PREVENTING BRIBERY

As a first step, you should raise your concerns with the person directly, however, we understand that you may not feel comfortable doing this, in which case report it to Janet Fensome.

Please also refer to separate guidance on Whistle Blowing. If you act in good faith, believing your information is accurate, you will be protected. Plowman Craven is committed to this Policy and will not tolerate any form of bullying or discrimination at work.

All gifts, rewards and hospitality you give/are given are to be recorded on the relevant Hospitality/Gift Declaration Form on the intranet. If you require help, please ask Janet Fensome.

We always

- Comply with this policy
- Act according to Plowman Craven values
- Comply with our requirements concerning any conflicts of interest
- Record all activities and transactions accurately, completely and transparently
- Follow due diligence and risk mitigation procedures before proceeding with any contract or other arrangement
- Seek advice if unsure
- Report any suspected breach promptly to your manager

We never

- Participate in any form of corrupt behaviour
- Use company funds, in the form of gifts, payments or hospitality for any unlawful, unethical or improper purpose
- Authorise, make, tolerate, encourage, invite or accept any improper payments to obtain, retain or improve business
- Permit anyone to offer or pay bribes or make facilitation payments on our behalf or do anything else we would not be permitted to do ourselves
- Offer or give anything of value to a public official (or their representative) to induce or reward them for acting improperly in the course of their public responsibilities
- Offer or accept gifts and hospitality, if we think this might impair objective judgment, improperly influence a decision or create a sense of obligation, or if there is a risk it could be misconstrued or misinterpreted by others

5. SPECIFIC RISKS FOR PLOWMAN CRAVEN

In our industry, specific areas with risk of bribery can be

- Facilitation payments (especially overseas)
- Kickbacks and reciprocal agreements
- False claims
- Corrupt third parties
- Excessive gifts and hospitality
- Inadequate record keeping
- Inadequate due diligence

Plowman Craven does not distinguish between facilitation payments and bribes, even if paid overseas and/or part of a recognised local culture. We will not participate in any kickback agreements or any form of improper payments to obtain new business, retain business or secure any improper advantage.

We will only work with those who are committed to our standards and will undertake due diligence to ensure this. We will ensure that all payments made to third parties are properly authorised and recorded.

Plowman Craven will only accept gifts and hospitality in accordance with our policy, and which are reasonable in terms of value and frequency.

All financial information and record keeping are subject to robust internal controls, so are accurate and complete. All hospitality, gifts and rewards given and received are to be entered on the Hospitality/ Gift Declaration Form.

6. DUE DILIGENCE

As well as compiling a comprehensive risk assessment of our transactions, sub-contractors, consultants and agents, Plowman Craven will ensure that we work only with those committed to our standards. Third parties will only be engaged when there is a clear business need and with an appropriate contract or framework agreement. All payments made to third parties are properly authorised and recorded.

Due diligence is only applicable to those third parties who actually perform services on our behalf.

7. HOSPITALITY

The government does not intend to ban genuine hospitality or similar business expenditure that is reasonable and proportionate. Plowman Craven also recognises the benefits that good hospitality can bring and does not intend this policy to prevent such expenditure.

The authorities will look at what is being offered, the way in which the hospitality was given and the level of influence the person receiving it had on the business decision in question. Hospitality or promotional expenditure which is proportionate and reasonable, given Plowman Craven's business, is unlikely to be viewed as bribery.

Examples of reasonable and proportionate are

- Meals under £75 per person for a client
- Gifts under £75 per person for specific event (eg at Christmas)

If you have any concerns, please raise them with Janet Fensome.

8. PENALTIES

Penalties for engaging in bribery are severe for both individual and Plowman Craven. There is a maximum jail term of 10 years and an unlimited fine for individuals.

For Plowman Craven, there is also an unlimited fine and the risk of being disbarred from bidding for public contracts. The reputational damage, however, could lead to loss of business, decrease in investor confidence and inability to raise external funding.

9. TRAINING AND QUESTIONS

If you are still unsure or should like further guidance, please contact Janet Fensome, Plowman Craven Limited.

Signed:

A handwritten signature in black ink, appearing to read 'Andy Molloy', with a long horizontal flourish extending to the right.

Name: Andy Molloy

Position: Managing Director – Plowman Craven