ANTI-BRIBERY, CORRUPTION, FRAUD AND COMPETITION LAW COMPLIANCE POLICY

1. Policy Statement

Ashton Scaffolding Services Ltd is committed to conducting all business activities honestly, fairly, ethically and in full compliance with all applicable legislation. The Company operates a zero-tolerance approach to bribery, corruption, fraud, financial crime, malpractice and anti-competitive behaviour.

We are committed to maintaining effective systems and controls designed to prevent, detect and respond to any form of bribery, corruption, fraud, money laundering, tax evasion facilitation, or unlawful anti-competitive practices.

This policy applies to all employees, directors, agency workers, subcontractors, consultants and any person acting on behalf of Ashton Scaffolding Services Ltd.

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2. Legal Compliance

The Company is committed to complying with all relevant legislation including, but not limited to:

- Bribery Act 2010
- Fraud Act 2006
- Proceeds of Crime Act 2002
- Criminal Finances Act 2017
- Competition Act 1998
- Enterprise Act 2002
- Digital Markets, Competition and Consumers Act 2024

All personnel are expected to understand and comply with these legal obligations when conducting business on behalf of the Company.

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3. Fraud and Malpractice Prevention

The Company maintains a range of measures to prevent, detect and control fraud and malpractice, including:

Due Diligence

- Verification of suppliers, subcontractors and professional consultants before engagement.
- Review of company registrations, insurances, qualifications and professional memberships.
- Financial due diligence where appropriate.
- Verification of bank account changes and payment requests.

Risk Assessment

- Periodic assessment of bribery, fraud and corruption risks within business operations.
- Review of high-risk suppliers, subcontractors and commercial arrangements.
- Assessment of procurement and payment processes to identify fraud vulnerabilities.

Monitoring and Controls

- Segregation of duties for purchasing, invoice approval and payment authorisation.
- Financial approval limits.
- Management review of expenditure and supplier payments.
- Internal monitoring of business transactions and procurement activities.
- Maintenance of accurate financial and business records.
- Two-Factory Authentication.
- Password Protection.
- Right to Work and ID Verification.
- HMRC Reporting and Monitoring.
- Bank Check and Verification.

Training and Awareness

- Employee induction training on ethical business conduct.
- Communication of relevant policies and procedures.
- Refresher training where necessary to ensure continued awareness of fraud and bribery risks.

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4. Anti-Bribery and Corruption Controls

No employee or representative of the Company shall:

- Offer, promise, authorise or give a bribe.
- Request, agree to receive or accept a bribe.

- Make facilitation payments.
- Use intermediaries to undertake actions prohibited by this policy.
- Provide any improper financial or other advantage intended to influence business decisions.

Any gifts, hospitality or entertainment offered or received must:

- Be reasonable and proportionate.
- Be lawful and transparent.
- Not influence, or appear to influence, business decisions.
- Be approved in accordance with company procedures.
- Be recorded where required.

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5. Competition Law Compliance

The Company is committed to competing fairly, openly and independently in all markets.

Employees must not engage in any activity that could restrict, distort or prevent fair competition.

The Company will not:

- Fix prices with competitors.
- Allocate customers, contracts or geographical territories.
- Exchange commercially sensitive information with competitors.
- Participate in bid-rigging arrangements.
- Agree to restrict competition in any market.

All employees involved in sales, estimating, procurement, supplier management or commercial activities are required to comply with competition law requirements.

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6. Arrangements to Detect and Prevent Anti-Competitive Behaviour

The Company operates the following controls to identify and avoid anti-competitive practices:

Due Diligence

- Assessment of commercial relationships and arrangements before entering agreements.
- Review of supplier and competitor interactions.
- Verification of compliance obligations during procurement activities.

Training

- Communication of competition law requirements to relevant employees.
- Awareness training for personnel involved in estimating, tendering and procurement activities.

Monitoring

- Management oversight of commercial and procurement activities.
- Review of tender submissions and pricing processes.
- Investigation of any concerns regarding anti-competitive conduct.

Risk Assessments

- Periodic review of business activities where competition law risks may arise.
- Assessment of interactions with competitors, trade associations and industry events.

Reporting

Employees must immediately report any concerns regarding:

- Price fixing.
- Market sharing.
- Bid rigging.
- Exchange of sensitive commercial information.
- Unlawful agreements with competitors.

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7. Reporting Concerns

Any employee who suspects bribery, corruption, fraud, financial crime or anti-competitive conduct must report their concerns immediately to their Manager or Company Director.

Reports will be investigated promptly, fairly and confidentially.

Individuals reporting concerns in good faith will be protected from victimisation or retaliation in accordance with the Company's Whistleblowing Policy (ASH54).

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8. Records and Documentation

The Company maintains accurate and complete records relating to:

- Gifts and hospitality.
- Procurement decisions.
- Tendering activities.
- Supplier and subcontractor due diligence.
- Financial transactions.

- Fraud and compliance investigations.
- Competition law compliance activities.

Records shall be retained in accordance with company document control and data retention procedures.

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9. Non-Compliance

Any breach of this policy may result in:

- Disciplinary action up to and including dismissal.
- Termination of contracts with suppliers or subcontractors.
- Referral to regulatory or law enforcement authorities.
- Civil or criminal proceedings against individuals involved.

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10. Responsibility and Review

The Managing Director has overall responsibility for ensuring compliance with this policy.

Managers are responsible for promoting a culture of ethical business conduct and ensuring employees understand their responsibilities.

This policy will be reviewed annually or sooner if there are changes to legislation, business activities or identified risks.

Paul Farmer
Managing Director
August 2026