

## CORRUPTION PREVENTION POLICY

Powertek Utilities Ltd (Powertek Utilities) is a specialist multi-utilities contractor providing gas, water, telecoms, cable jointing, cable laying and civil engineering services. The company is committed to ensuring that all of its activities are conducted in accordance with all applicable legal and regulatory requirements and the highest standards of ethical business conduct.

The purpose of this policy is to set out Powertek Utilities' position on bribery and corruption and provide guidance to employees on the prevention, detection and reporting of bribery and corruption.

The corporate conduct of Powertek Utilities is based on acting responsibly, honestly and with integrity and the Company does not engage in or tolerate any form of bribery and corruption.

Any Powertek Utilities employee engaging in business practices which infringe the Bribery Act 2010 or any other legal or regulatory requirements or fall below the highest standards of ethical business conduct may be subject to disciplinary action which may lead to dismissal and may face personal criminal or civil liability.

This policy applies to Powertek Utilities and every employee (which for these purposes also includes temporary or contract employees) and their connected persons. For the purposes of this policy, 'connected persons' includes an employee's family members such as spouse or civil partner, anyone living as a partner in an enduring family relationship, children, step-children and parents.

In addition, it is very important that employees take steps to ensure that the terms of this policy are complied with by third party service suppliers (which for these purposes includes consultants, agents, brokers, lobbyists, lawyers, tax advisers and other professionals) acting on the Company's behalf, as Powertek Utilities may incur criminal or civil liability where such service providers make unlawful payments or use illegal, unethical or improper means in the course of their work on behalf of the Company.

Powertek Utilities does not engage in or tolerate any form of bribery or corruption. It is contrary to the Company's policy for any employee or third party acting on behalf of Powertek Utilities to engage in any conduct which may constitute bribery or corruption.

Powertek Utilities respects all laws relevant to countering bribery and corruption, particularly laws that are directly relevant to specific or local business practices. It is the responsibility of every employee of Powertek Utilities to ensure that company business practices comply with all statutory requirements and appropriate legal advice should be sought as necessary.

Bribery or corruption can be defined as the offering, promising, giving, accepting or soliciting of an advantage as an inducement which is illegal or a breach of trust. Bribery generally involves paying or offering to pay money or something of value to someone in business or in the public sector in order to obtain or retain a commercial advantage or to induce or reward the recipient for acting improperly. Corruption can also take place where the offer or payment is made by or through a third party.

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The most prevalent forms of bribery and corruption stem from:

- Payments to a company's employees or their connected persons, or to those of a third party, to secure advantage in business transactions
- Political contributions made to secure advantage in business transactions
- Charitable sponsorships used to secure advantage in business transactions
- Facilitation payments or other benefits made to secure or accelerate routine or necessary business actions
- Gifts, hospitality and expenses payments made to secure advantage in business transactions
- Provision of favours to public officials other than through normal business procedures
- Uncompensated use of company services, facilities or property
- Provision of training and associated travel, accommodation and living costs to public officials
- Conflicts of interest where staff or management may hold an interest which may provide a business advantage to the Company

Powertek Utilities prohibits employees (whether acting in their own capacity or on the Company's behalf) from:

- Offering, promising, giving, paying or authorising, directly or indirectly, any bribe, facilitation payments or other benefits to or for the benefit of any person (whether in private or public office) in order to obtain any improper business advantage or other advantage for the Company or themselves or any of their connected persons
- Soliciting, accepting or receiving (whether for the Company's benefit, their own benefit or the benefit of any connected persons) any bribe, facilitation payment or other benefit from any person (whether in private or public office) in return for any improper business or other advantage
- Otherwise using illegal, unethical or improper means (including bribes, favours, blackmail, financial payments, inducements, secret commissions or other rewards) to influence the actions of others (whether in private or public office)
- Acting as an intermediary for any third party (private or public) in the solicitation, acceptance, receipt, offering, promising, giving, paying or authorising of any bribe, facilitation payments or other kickbacks or otherwise in the use of illegal, unethical and improper means to influence the actions of others (whether in private or public office)
- Falsifying records to obscure any actions which may not be in accordance with this Policy.

Staff are required to declare any conflicts of interest or potential conflicts of interest.

All employees are required to comply with this policy and the Police will be contacted if the Policy is breached.

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The Company is committed to training its employees in relation to anti-corruption and bribery issues and the procedures and controls implemented in accordance with the requirements of this policy. Failure to comply with this policy may result in disciplinary action, which may lead to dismissal, and expose the Company and/or its employees to criminal or civil liability.

### **Procedure for Making a Bribery or Corruption Allegation**

It is the responsibility of all Powertek Utilities employees to ensure that they report any infringement or suspected infringement of legal or regulatory requirements or the highest standards of ethical business conduct involving Powertek Utilities to their line manager. All reports from any source will be dealt with confidentially.

Concerns should be expressed in writing to the Managing Director. If the concern involves the Managing Director (Steve Higgins) then the Director of Multi-Utilities (Fraser Baxter) should be the first point of contact. It is expected that the person receiving the allegation will become the investigating officer. However, it is at the discretion of this person to delegate the investigation to another person if they feel this is appropriate.

Concerns should be presented in writing for the avoidance of doubt, setting out the background and history of the concern; giving names, dates and places where possible and explaining the reason for concerns. If unable to put the matter in writing an employee can still raise their concern verbally and should telephone or arrange to meet the appropriate person.

If any employee believes that the terms of this policy are not being correctly adhered to then they should seek to raise any concerns with their line manager.

The Company will not permit reprisal of any kind by or on behalf of the Company or any employee against any individual for making good faith reports of violations or suspected violations of this policy.

Employees must co-operate fully and openly with any investigation by the Company into alleged or suspected breaches of this policy. Failure to co-operate or to provide truthful information during any investigation may lead to employees being subject to disciplinary action, which may lead to dismissal.

### **Compliance**

The Company is committed to monitoring compliance with this policy.

Monitoring of compliance with this policy will include reviewing the nature and extent of payments made to or received from third parties, reviewing the assessment of bribery and corruption risks, and the implementation of compliance requirements such as training and certifications.

### **Breach of this policy**

Any breach of this policy will be treated as a potential disciplinary issue and dealt with through our disciplinary procedure.

Employees must report all suspected breaches of this policy to their line manager.

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## **CORRUPTION PREVENTION POLICY**

Powertek is committed to continual improvement, monitoring compliance with this policy and the constant improvement of policies, processes and procedures to improve performance and provide highest levels of customer satisfaction.

Signed on behalf of Powertek Utilities Ltd:

A handwritten signature in black ink, appearing to read "Steve Higgins".

**Steve Higgins**

**Managing Director**

**Date: 1 January 2023**

**Next Review Date: January 2024**

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