Bribery and Corruption Policy

1. Introduction

1.1 This policy applies to Briggs & Forrester (UK) Limited on its own behalf and on the behalf of all its subsidiary companies within the Briggs & Forrester Group Ltd ('the Group'): Briggs & Forrester Engineering Services Ltd, Briggs & Forrester Living Ltd, Briggs & Forrester Special Projects Ltd, and Briggs & Forrester (Holdings) Ltd.

1.2 The Group specialises in the design, installation, project management, testing and commissioning of building engineering services.

1.3 The Group operates UK wide on varying sizes of projects including public and private sectors, schools, hospitals, government agencies, local authorities, industrial, commercial, and residential properties.

1.4 The Group has a zero-tolerance for bribery and corruption.

1.5 The Group's reputation with its clients and other stakeholders is underpinned by ethical behaviour, financial probity, and honesty.

1.6 This policy applies to all employees and anyone acting for, or on behalf of, the Group ("associated persons"), including temporary workers, sub-contractors, consultants, suppliers, and agents.

1.7 This policy relates to the Bribery Act 2010.

2. Responsibilities

2.1 All employees and associated persons are responsible for maintaining the highest standards of business conduct and are expected to behave honestly, ethically and with integrity. Any breach of this policy will constitute a serious disciplinary offence, which may lead to dismissal and may become a criminal matter for the individual.

2.2 The Group prohibits employees and associated persons from offering, giving, soliciting, or accepting any bribe. The bribe might include cash, a gift or other inducement, to or from any person or organisation, wherever they are situated, and irrespective of whether or not they are an employee, private person, or company, by any individual, employee, agent or other person or company acting on the Group's behalf.

2.3 Employees and all associated persons are requested to remain vigilant in preventing, detecting, and reporting bribery. Employees and associated persons are expected to report any concerns regarding any suspected bribery in accordance with the Group's procedures.

2.4 Where there are suspicions of bribery or corruption, employees and associated persons should contact the Group Finance Director, or their authorised delegate, who will determine the appropriate next steps in accordance with the Group's procedures.

3. Policy

3.1 The Group will limit its exposure to bribery by:

- Setting out a clear bribery policy, which is proportionate to the risks that the Group is exposed to.
- Providing relevant awareness and understanding of the Group's bribery policy amongst staff, "associated persons" (any person performing services for or on behalf of the company), and external persons or organisations with whom the Group has commercial relations.

- Training staff as appropriate to recognise and avoid the use of bribery by themselves and others.
- Encouraging staff to be vigilant and to report any suspicion of bribery or corruption, providing them with suitable channels of communication, and ensuring sensitive information is treated appropriately.
- Rigorously investigating instances of alleged bribery or corruption in accordance with the Group's disciplinary procedure; and assisting the police and other appropriate authorities in any resultant prosecution.
- Taking firm and vigorous action against any individual(s) involved in bribery.

3.2 This policy is not intended to prohibit appropriate corporate entertainment and/or hospitality undertaken in connection with the Group's business activities, provided the activity is customary under the circumstances, is proportionate, and is properly disclosed to the appropriate Company Director and in accordance with the Group's procedures.

4. Competition law compliance

4.1 The Group is committed to conducting its business in compliance with applicable UK competition law, including the Competition Act 1998, the Enterprise Act 2002 and the Digital Markets, Competition and Consumers Act 2024. Employees and associated persons must not engage in anti-competitive agreements, practices or conduct, including price fixing, bid rigging, market sharing, exchange of commercially sensitive information, or any conduct intended to restrict, distort or prevent competition.

4.2 The Group supports compliance through proportionate due diligence, monitoring of business relationships and tendering activity, relevant staff training, and risk assessments where activities may present increased exposure to bribery, corruption or anti-competitive behaviour.

4.3 Employees and associated persons are expected to remain alert to potential anti-competitive behaviour and to report any concerns promptly to the Group Finance Director, or their authorised delegate, so that appropriate investigation, escalation and remedial action may be taken.

5. Related policies and procedures

- Code of Conduct, Disciplinary Rules and Procedure
- Group Whistleblowing: See Hear Speak Up Policy

5.1 Briggs & Forrester is committed to upholding the highest standards of conduct and ethics in all areas of its business. In line with this commitment SeeHearSpeakUp has been appointed to provide an external and independent confidential reporting service to all those working on its behalf.

5.2 Any suspected breaches of this policy may be reported anonymously to SeeHearSpeakUp and senior officers in the organisation will be notified for further investigation, if appropriate.

6. Communication of this policy

6.1 A full copy of this policy is accessible to all interested parties via the Group website.

6.2 All new direct employees are required to read and understand the requirements of this policy.

6.3 All employees are required to complete relevant training, through either site induction or via our inhouse learning management system.

7. Review and updating of this policy

7.1 This policy will be reviewed and updated annually and amended as necessary to reflect any changes to the Group, its management systems, or relevant legislation.

7.2 The Group's Senior Management Team continually monitor this policy's procedures to ensure compliance and continual improvement. All reports, reviews and results of monitoring processes will be recorded, and records retained.

Paul Burton
Group Chairman and Chief Executive