

COU-POL-014
ANTI-BRIBERY & CORRUPTION POLICY

It is the Policy of Cousins Ltd to comply with The Bribery Act 2010 with regard to the prevention of fraud, malpractice, and the management of the giving and receiving of business gifts and entertainment. This document sets out our arrangements for achieving this; it adopts the principles of BS10500 in order to ensure a systematic approach to the management of this threat and applies to all of the Cousins work activities.

What Is Fraud?

While there is no precise legal definition of fraud; many of the offences referred to as fraud are covered by the Theft Acts of 1968 and 1978, and the Forgery & Counterfeiting Act 1981. The term is used to describe such acts as theft, deception, bribery, forgery, corruption, false accounting, and conspiracy to commit these offenses. For practical purposes, fraud may be defined as the use of deception to obtain an advantage, avoid an obligation, or cause loss to another party.

What is bribery?

Bribery is the offer or receipt of any gift, loan, payment, reward, or other advantage to or from any person as an encouragement to do something that is dishonest, illegal, or a breach of trust, in the conduct of the company's business.

What is Corruption?

Corruption is the misuse of entrusted power for private gain.

Communication of the Policy

The Policy is communicated to staff through induction training, and it is available for all staff to view on Teams at Office Admin> New Business Management System > Level One documents > Company Policies

Risk Assessment

The company has identified that through the nature of its business and relationships, there is a potential for behaviour that does not comply with the legislation and that the risk of occurrence is low, although the consequences would be very serious. Employees should be aware that if they engage in work activities that are contrary to UK anti-bribery and corruption legislation, they could face up to 10 years in prison and/or an unlimited fine, and Cousins Ltd could also be liable to an unlimited fine and Government sanction. There are also significant commercial consequences to the business through exclusion from tender opportunities.

Training & Guidance

All new staff receive induction training on the content of the Policy, the arrangements for its implementation, and their responsibilities under it. Guidance on our policy is provided below. Staff also complete an on-line training course in joining the business.

If you are at any time uncertain as to whether your actions will comply with this policy, you must seek guidance from your line manager or from the HR Department, who is the compliance manager for this Policy.

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Employees must always act in accordance with the following provisions: -

- Behave honestly, be trustworthy, and set a good example.
- Use the resources of the company in the best interests of the Group.
- Do not misuse company resources.
- Make a clear distinction between the interests of the company and private interests to avoid any conflict of interest, and if such conflict does arise, report it to your line manager immediately.
- Ensure that any community support, sponsorship, and charitable donations do not constitute bribery, and if in doubt, consult the line manager.
- Do not offer or accept bribes.
- Do not engage in 'Cover Pricing'.

Bribery and Corruption

Bribery is a criminal offense; we do not, and will not, pay bribes or offer improper inducements to anyone for any purpose, nor do we or will we accept bribes or improper inducements. Employees, our agents, or consultants must never offer, give, accept, or receive, directly or indirectly, a bribe in any form.

Bribery is a form of corruption involving the giving or receiving by any person of anything of value (such as money, a gift, loan, reward, favour, or other consideration), either directly or indirectly, as an inducement to gain an undue advantage or influence contrary to the principles of openness and integrity. It is the Group's policy not to make donations to political parties or politicians.

Corporate Entertainment & Gifts (with Clients, Consultants, and other third parties)

The giving or receiving of gifts and entertainment can build understanding and expand relationships in everyday business life, but it can also cause a conflict of interest between personal interests and professional duty as it may erode the confidence and trust of others in our business decisions.

Determining what is acceptable and what is unacceptable requires each employee to exercise good judgment and moderation. Accepting or offering any gift or entertainment regardless of value that either makes the recipient feel obligated or could be construed to make the recipient feel obligated to start or continue a business relationship is unacceptable and will be a breach of our policy. It is never acceptable to accept a gift in cash or cash equivalent.

Giving and receiving of promotional items of nominal value is acceptable. Modest and reasonable entertainment with business partners in the ordinary course of business, including occasional meals of reasonable expense, is generally acceptable. As a rule of thumb entertainment will not be considered modest and reasonable if the entertainment leads to a sense or feeling of obligation or a perception of an obligation on the part of the recipient.

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Ordinary sports, theatre, and other cultural or social events are acceptable if they: -

- Are reasonable and modest in terms of value viewed either as a single event or as a total value over a period.
- Cannot be construed as a bribe or a pay-off.
- Are not in contravention of law or ethical standards including the ethical policies of the recipient's organisation if these policies apply stricter rules than we have set out in our Policy.
- Have a relevant business rationale.
- Would not embarrass either the company or the employee if there was public disclosure of the entertainment.

Controlling, Reporting & Recording

Employees must not, without express prior written approval from your line manager, offer or accept any gifts or hospitality to or from clients, contractors, suppliers, other third parties, or public officials.

Managers must not authorise the offering or acceptance of any gifts or hospitality without reference to a director where they are in any doubt as to whether it meets company guidelines. A register of hospitality and approaches from suppliers or other parties is maintained by HR for the protection of all employees. All approaches, incidents, risks, and issues, including offers of hospitality which are contrary to this policy or must be confidentially reported to HR for recording on the register.

Directors will implement an investigation of any instance of apparent non-compliance and may institute further action according to the findings.

Review

This Policy will be reviewed periodically to ensure its ongoing effectiveness at ensuring we meet our compliance obligations.

By complying with this policy document, we aim to ensure that employees will not at any time knowingly breach any relevant anti-bribery and corruption legislation and that by adhering to the Policy, Cousins Ltd can demonstrate that it has adequate procedures in place to prevent such activity.

You have an independent obligation to prevent bribery and corruption in the company and to ensure that any interaction with public officials complies with this policy document and relevant laws.



T Wilkinson
Group Operations Director

05/01/2026