

## Anti-Bribery and Corruption Policy

### Policy Statement

Pritchard Group Ltd is committed to conducting all business with integrity, transparency, and fairness. We take a zero-tolerance approach to bribery and corruption and will uphold all laws relevant to countering bribery and corruption, including the UK Bribery Act 2010.

This policy applies to all employees, directors, contractors, partners, and any third parties representing the company.

---

### Our Position on Bribery

We do not permit:

- The offering, giving, soliciting, or accepting of any bribe, whether in cash or in any other form.
  - Any facilitation payments to secure or speed up routine processes.
  - Any gifts, hospitality, or entertainment that could be seen as a reward or influence for a business advantage.
- 

### Responsibilities

**Management and Directors** are responsible for ensuring that this policy is communicated and implemented across the organisation.

**All Employees and Contractors** must:

- Refuse any offer of a bribe or facilitation payment.
  - Report any suspected bribery or corruption via the appropriate channels.
  - Declare any gifts or hospitality offered to or received from clients, suppliers, or partners.
- 

### Third Parties and Partners

All delivery partners, consultants, and subcontractors must commit to this policy and are expected to conduct their business without bribery or corruption. Any breach of this policy by a third party will result in review and potential termination of contract.

---

### Gifts and Hospitality

We recognise that gifts and hospitality can be part of building relationships. However, they must:

- Be reasonable and proportionate.
  - Not be intended to improperly influence a business decision.
  - Be declared in our internal register if they exceed a set value.
- 

### Reporting Concerns

Employees and partners are encouraged to report concerns promptly. Reports will be treated confidentially and without fear of reprisal.

---

### Monitoring and Review

This policy will be reviewed annually, and awareness training will be provided as part of company inductions and ongoing compliance requirements.

---

### Policy Acceptance

I confirm that I have read and understood the Anti-Bribery and Corruption Policy. I agree to comply with its principles in all business dealings.

---

Signed 

---

Print Name: Shane Pritchard

---

Date: 25/04/2025