

It is our policy to conduct all our business in an honest and ethical manner; The Partnership is committed to acting professionally fairly and with integrity in all our business dealings and relationships wherever we operate and to implementing and enforcing effective systems to counter bribery.

We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. We remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both at home and abroad.

## The Purpose of This Policy Is To:

- set out our responsibilities, and of those working for us, in observing and upholding our position on bribery and corruption;
- and provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues in order to ensure that we, and those working for us, comply with all applicable legal obligations.

In this policy, 'third party' means any individual or organisation you come into contact with during the course of your work for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, sub contractors, joint venture partners, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

## Who Is Covered by The Policy?

This policy applies to all employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, homeworkers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries or their employees, whether located within or outside the United Kingdom (collectively referred to as workers in this policy).

The Equity Partners have primary and day-to-day responsibility for implementing this policy, and for monitoring its use and effectiveness. Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

## What Is Bribery?

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. There are four types of offence set out in the Bribery Act 2010:

- Giving a bribe;
- Receiving a bribe;
- Bribing a foreign public official; and
- A corporate offence of failing to prevent bribery by an associated person for the organisation's benefit.

## Gifts & Hospitality

The Partnership recognises that market practice varies across the areas in which it does business and what is normal and acceptable in one place may not be in another. This policy statement prohibits any inducement which results in a personal gain or advantage to the recipient or any person or body associated with them, and which is intended to influence them to take action which may not be solely in the interests of the Partnership or of the person or body employing them or whom they represent.

This policy is not meant to prohibit the following practices providing they are customary in a particular market, are proportionate and are properly recorded:

- Bona fide hospitality and promotional or other business expenditure which seeks to improve the image of Ridge cement good relations or enhance the knowledge of Ridge and its services.
- The giving or receiving of a nominal ceremonial gift on a festival or another special time.
- The offer of resources to assist the person or body to make the decision more efficiently provided that they are supplied for that purpose only.

Gifts, entertainment and hospitality including the receipt or giving of gifts, meals or tokens of appreciation, invitations to events, functions or other social gatherings are acceptable provided they fall within reasonable bounds of value or occurrence, and are given openly.

## Facilitation Payments and Kickbacks

Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official.

If you are asked to make a payment on our behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always obtain a receipt which details the reason for the payment. If you have any suspicions, concerns or queries regarding a payment, you should raise these with your manager.

Kickbacks are typically payments made in return for a commercial favour or advantage. All workers must avoid any activity that might result in a kickback being made or accepted by us.

## Your Responsibilities

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. All workers are required to avoid any activity that might lead to a breach of this policy.

You must tell your manager as soon as possible if you believe that a conflict with this policy has occurred, or may occur in the future. For example, if a client or potential client indicates to you that a gift or payment is required to secure their business.

Any employee who breaches this policy will face disciplinary action, which could result in summary dismissal for gross misconduct. We also reserve our right to terminate our contractual relationship with non employees if they breach this policy.

## Record-Keeping

We must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

If a company is not able to defend itself against the Corporate Offence and is consequently convicted of bribery the penalties could be an unlimited fine and/or the company may be prevented from undertaking government business

If an individual is successfully prosecuted under the Act, they, partners and senior managers could face up to 10 years imprisonment and/or an unlimited fine.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

## How To Raise a Concern

You are encouraged to raise concerns about any malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries, these should be raised with your manager. The Partnership's Professional Ethics Statement and the Whistle-blowing Policy give further guidance to Partners and staff on the action to be taken where they perceive fraudulent or corrupt acts are being perpetrated.

## Protection

Workers who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We encourage openness and will support anyone who raises genuine concerns in good faith under this policy.

We are committed to ensuring no-one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual bribery or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform HR immediately.

## Communication

Our Anti-Bribery and Corruption statement should be given to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter. It should also be included in project 'start-up' briefings with staff, in particular for large contracts and those carried out in countries in which corruption and/or bribery is known to be an issue.

## Monitoring and Review

The Executive Group will review compliance with this Policy Statement annually.

This policy does not form part of any employee's contract of employment or otherwise any contract with any third party and it may be amended at any time.



**Adrian O'Hickey**  
**Senior Partner**  
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