

## 2.12 Anti-Bribery & Corruption Policy Statement

It is the policy of SMD Scaffolding to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our dealings wherever we operate. We are also committed to implementing and enforcing effective systems to counter bribery.

This policy applies to all individuals working at all levels and grades, including senior manager, director, Operatives (whether permanent, fixed-term or temporary), consultants, contractors and any other person providing services to us.

For the purposes of this policy, a bribe is a financial or other advantage offered or given to anyone to persuade them to or reward them for performing their duties, improperly or, to any public official with the intention of influencing the official in the performance of his duties.

We do not make and will not accept facilitation payment or 'kickbacks' of any kind. Facilitation payments are typically small, unofficial payment made to secure or expedite a routine government action by a government official. Kickbacks are typically payment made in return for a business favour or advantage. All Operatives must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.

Operatives will be encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. No Operative will suffer any detriment as a result of raising genuine concerns about bribery, even if they turn out to be mistaken.

The effectiveness of this policy will be regularly reviewed by the board. Internal control systems and procedures will be subject to audit and review under the internal audit process.

Signed



Stephen McDermott  
**Managing Director**