

Bribery Policy

This policy statement provides a framework within which staff must operate to avoid committing an offence under the Bribery Act 2010 (the 'Act').

The Act creates the following offences relevant to Ecore Construction Management Ltd:

- Paying bribes – it is an offence to offer, promise or give a bribe (so-called 'active bribery')
- Receiving bribes – it is an offence to request, agree to receive or accept a bribe (so-called 'passive bribery')

A person who is convicted of an offence of paying a bribe or receiving a bribe is liable on conviction to a maximum penalty of 10 years' imprisonment, a fine, or both.

A corporate offence is where a commercial organisation or associated person fails to prevent persons performing services on its behalf from committing bribery. Ecore Construction Management Ltd would be guilty of this offence if the person who performs a service on behalf of the organisation bribes another person intending;

- a) to obtain or retain business for Ecore Construction Management Ltd; or
- b) to obtain or retain an advantage in the conduct of business for Ecore Construction Management Ltd.

If an organisation is found guilty of corporate bribery, the organisation and its managers and/or directors could be subject to criminal sanctions. An 'associated person' acting on behalf of the company could potentially include Ecore Construction Management Ltd directors, staff, agents and sub-contractors.

Acts of bribery or corruption are designed to influence an individual in the performance of their duty and incline them, to act dishonestly. Bribes can take on different shapes and forms and often both parties will benefit. A bribe can involve a direct or indirect promise or offer of something of value, the offer or receipt of a loan, fee or reward or other advantage and/or giving of aid, donations or voting with the intention of exerting improper influence.

Ecore Construction Management Ltd Policy Statement

It is Ecore Construction Management Ltd policy to conduct its business in an open, honest and transparent way and without the use of corrupt practices or acts of bribery to obtain an unfair advantage. Ecore Construction Management Ltd is committed to adherence to the highest legal and ethical standards and this must be reflected in every aspect of the way in which Ecore Construction Management Ltd operate.

All staff will receive training which will enable them to be effective in the discharge of their responsibilities.

The company does not preclude the acceptance of hospitality, gifts or entertainment so long as they are reasonable. Limits are prescribed in the policy.

The acceptance or commission of a bribe is considered to be an act of gross misconduct and renders that member of staff liable to disciplinary action if found guilty.

Gifts, Entertainment and Hospitality

Gifts, entertainment and hospitality include the receipt or offer of gifts, meals, invitations to events and functions in connection with matters relating to Ecore Construction Management Ltd business. These activities are acceptable provided they fall within reasonable bounds of occurrence and value. Routine inexpensive and very occasional gifts, entertainment and hospitality are acceptable, whereas lavish or extraordinary gifts, entertainment and hospitality are not.

Before accepting or giving a gift, staff must always be aware as to the intent.

- Is it to build a relationship or is it something else?
- How would this look to the 'reasonable man in the street'?

If you find it difficult to answer these questions, there may be a risk involved and the risk could be unlawful. If you are in any doubt, in the first instance contact the Managing Director immediately.

Gifts, entertainment and hospitality that are never acceptable include where something is offered for something in return. Gifts of cash or cash convertible items are expressly prohibited.

Awarding a Contract for Goods or Services (Procurement)

Staff dealing with or using other parties must be aware of the possibility of being influenced to engage in or facilitate bribery. Staff could, for instance, receive excessive hospitality or gifts in order that they, on the company's behalf, give business to the other party. Staff must not accept any gift, hospitality or entertainment which is, or could be, construed as being designed to influence you in the performance of your job and/or to influence you to act dishonestly.

Modest entertainment or invitations to events as part of pre-contract negotiations are likely to be acceptable but in every event your line manager must be informed.

Donations

Ecore Construction Management Ltd do not make contributions to political organisations. Ecore Construction Management Ltd only make charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made without the prior approval of the Managing Director.

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Media and Complaints

Any member of staff who is contacted by the media or is the subject of any complaint in respect of bribery allegations should report that immediately to the Managing Director.

Integrity of Staff

Ecore Construction Management Ltd recognises that a good standard of staff recruitment and vetting is important in order to reduce the risk of employing staff who are easily persuaded and/or willing to engage in corrupt practices, including bribery and fraud.

Training

Staff will receive a briefing on the act upon induction or once if currently employed, ad-hoc briefing talks re-emphasising the policy.

How to Raise a Concern

All staff have a responsibility to help detect, prevent and report instances, not only of bribery but also of any other suspicious activity or wrongdoing. Ecore Construction Management Ltd is committed to ensuring that all staff have a safe, reliable and confidential way of reporting any suspicious activity. If any staff member has a concern regarding a suspected instance of bribery or corruption they must notify the Managing Director.

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In this section all references to "HSEQ" are to be read as including health and safety, and references to "company" refer to Ecore Construction Management Ltd.

Board of directors

The overall responsibility for health and safety (HSEQ) matters rests with the directors.

All supervisors are responsible, through their line management, to the managing director for carrying out the duties assigned to them.

The Directors will appraise the board on HSEQ performance through the regular board meeting and associated report.

Managing Directors

The Managing Directors are responsible for providing an organisation with clearly defined responsibilities, which shall develop and implement effective management of Health, Safety, Environment and Quality which will be subject to continual measurement and review.

The MD's will implement the policy by:

- Providing an organisation with adequate resources - encompassing engineering, construction, technical and functional aspects of our undertakings - with clearly defined responsibilities which shall plan, implement measure and review our management of HSEQ in order that it is subject to progressive improvement.
- Making provision for safe working procedures at tender and during any planning and construction stages of any contract; ensuring the provision of adequate resources including the appointment of competent persons to apply risk assessment techniques and thereafter to produce complementary control measures both in the form of company health and safety instructions and also specific workplace management plans.
- Arranging with purchasing personnel and senior workplace managers for the assessment of competence of subcontractors to carry out and, or, manage the work involved.
- Ensuring that the company's undertakings are conducted in compliance with company procedures and legislative requirements.
- Designating competent management safety environment representatives (MSERs) and management quality representatives (MQRs) for each workplace to co-ordinate the activities as instructed.
- Establishing and supporting effective health and safety monitoring systems by senior managers.
- Nominating senior managers to carry out investigations of serious accidents, incidents and non-conformance.
- Monitoring health and safety standards both during workplace visits and also by receipt and review of the company's various monitoring systems.
- Promoting health and safety awareness amongst all employees through leading by example and also monitoring corrective actions subsequent to review of the various monitoring systems.
- Liaising with the HSEQ functions on the progressive development of the health and safety management arrangements.
- Responding to the Regulatory Authorities and registration bodies on any appropriate correspondence or communication.

Director responsible for Health, Safety & Quality

The director responsible for Health, Safety & Quality will implement the policy by:

- Liaising with other directors and managers on the development, implementation and review of the HSEQ policies.
- Liaising with directors with a view to setting HSEQ objectives and receiving feedback as to whether or not these objectives are being achieved.
- Providing a statement should a policy decision be required on HSEQ matters when dealing with external bodies.
- Liaising with the managers responsible for health and safety to ensure that the company has adequate safety coverage, resources and sufficient trained advisers to provide an up to date, adequate and competent HSEQ advisory service and assistance.
- Liaising with the directors to ensure that the HSEQ policies are maintained under continual review and updated to accommodate significant change to meet legislative or business practice requirements.
- Liaising with the HSEQ consultants on the formulation and development of the company's health and safety management arrangements.
- Formulating and developing specific HSEQ management arrangements within the framework of the company requirements.
- Ensuring that HSEQ standards, procedures and monitoring systems are formulated and applied to the business.
- Ensuring that HSEQ training programmes are implemented and assisting in the development of the health and safety training policy by identifying training needs.
- Liaising with the HSEQ consultants on the setting of HSEQ objectives and providing feedback as to whether or not these objectives are being achieved.
- Receiving regular HSEQ reports on the performance of the business and advising directors of the current position.
- Providing a team of auditors to assist in the achievement of progressive improvements to the HSEQ management arrangements and to provide feedback on the adequacy of the management of Health and Safety.

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Director responsible for Environment

The director responsible for Environment will implement the policy by:

- Liaising with other directors and managers on the development, implementation and review of the HSEQ policies.
- Liaising with directors with a view to setting HSEQ objectives and receiving feedback as to whether or not these objectives are being achieved.
- Providing a statement should a policy decision be required on HSEQ matters when dealing with external bodies.
- Liaising with the managers responsible for health and safety to ensure that the company has adequate safety coverage, resources and sufficient trained advisers to provide an up to date, adequate and competent HSEQ advisory service and assistance.
- Liaising with the directors to ensure that the HSEQ policies are maintained under continual review and updated to accommodate significant change to meet legislative or business practice requirements.
- Liaising with the HSEQ consultants on the formulation and development of the company's health and safety management arrangements.
- Formulating and developing specific HSEQ management arrangements within the framework of the company requirements.
- Ensuring that HSEQ standards, procedures and monitoring systems are formulated and applied to the business.
- Ensuring that HSEQ training programmes are implemented and assisting in the development of the health and safety training policy by identifying training needs.
- Liaising with the HSEQ consultants on the setting of HSEQ objectives and providing feedback as to whether or not these objectives are being achieved.
- Receiving regular HSEQ reports on the performance of the business and advising directors of the current position.
- Providing a team of auditors to assist in the achievement of progressive improvements to the HSEQ management arrangements and to provide feedback on the adequacy of the management of Health and Safety.

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Directors

The Directors are responsible for providing an organisation with clearly defined responsibilities, which shall develop and implement effective management of Health, Safety, Environment and Quality which will be subject to continual measurement and review.

The Respective Director will implement Ecore Construction Management Ltd policy by:

- Providing an organisation with adequate resources - encompassing engineering, construction, technical and functional aspects of our undertakings - with clearly defined responsibilities which shall plan, implement measure and review our management of HSEQ in order that it is subject to progressive improvement.
- Making provision for safe working procedures at tender and during any planning and construction stages of any contract; ensuring the provision of adequate resources including the appointment of competent persons to apply risk assessment techniques and thereafter to produce complementary control measures both in the form of company health and safety instructions and also specific workplace management plans.
- Arranging with purchasing personnel and senior workplace managers for the assessment of competence of subcontractors to carry out and, or, manage the work involved.
- Ensuring that the company's undertakings are conducted in compliance with company procedures and legislative requirements.
- Designating competent management safety environment representatives (MSERs) and management quality representatives (MQRs) for each workplace to co-ordinate the activities as instructed.
- Establishing and supporting effective health and safety monitoring systems by senior managers.
- Nominating senior managers to carry out investigations of serious accidents, incidents and non-conformance.
- Monitoring health and safety standards both during workplace visits and also by receipt and review of the company's various monitoring systems.
- Promoting health and safety awareness amongst all employees through leading by example and also monitoring corrective actions subsequent to review of the various monitoring systems.
- Liaising with the HSEQ functions on the progressive development of the health and safety management arrangements.
- Responding to the Regulatory Authorities and registration bodies on any appropriate correspondence or communication.

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Health and safety consultants

The company HSEQ consultant appointed for HSEQ will assist implementation of policies by:

- Ensuring that the policies are maintained under continual review and updated annually or to accommodate significant change to meet legislative or business practice requirements.
- Ensuring the director responsible for health and safety and the Managing Director are kept informed on the requirements of all incidents and, or, accidents as they occur and that confidentiality requirements are maintained at all times.
- Liaising with the director responsible for health and safety and the Managing Director on the formulation and progressive development of their company's management arrangements.
- Ensuring that standards, procedures and monitoring systems are formulated and assist in there applied.
- Ensuring that health and safety training policies are available and training programmes current, monitored and reported on.
- Liaising with directors with a view to setting health and safety objectives and receiving feedback as to whether or not these objectives are being achieved.
- Advising the managing director and directors on the current position regarding health and safety legislation.
- Liaising with the director responsible for healthy and safety to ensure that the company has adequate coverage, resources and sufficient trained personnel to ensure health and safety matters are correctly addressed.
- Ensuring that advisory services are maintained and are available at all times on matters affecting the health, safety and welfare of all personnel at their place of work.
- Ensuring that personnel are regularly and properly informed by maintaining a co-ordinated system of health and safety publicity, poster campaigns, promotions and adequate level of training.
- Ensuring that personnel at all levels are properly updated on new and revised health, safety and environmental legislation, and quality standards.

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Operations managers

The managers with functional responsibility for operations and engineering will implement the policy by:

- Ensuring the construction team has an appreciation of the uncertainties and sensitivities of the design as well as the risks to both employees and the integrity of the structure from the construction process by appropriate briefings on the findings of the design risk assessment and providing recommendations on elements of quality control. This briefing should enable the construction team to plan the necessary methodology, quality, management, contingency and emergency arrangements to maintain the works within the control of the project team at all times.
- Ensuring that the client is informed of risks to both maintenance and repair employees (future use) and to long term stability of the structure by the provision of residual risk information to the Principal Contractor.
- Ensuring the client is informed of risks to both employees and the integrity of the structure from criteria which require stringent control during eventual demolition or dismantling by providing residual risk information to the Principal Contractor.
- Co-operating with the Principal Contractor and any other designers who are involved with the project.
- Producing designs which minimise waste and are sensitive to the physical and social environments in which we operate.
- Ensuring all relevant legislation is being adhered to during operational works.
- Providing a department with adequate resources - encompassing engineering, construction, technical and functional aspects of our undertakings - with clearly defined responsibilities which shall plan, implement measure and review our management of HSEQ in order that it is subject to progressive improvement.
- Making provision for safe working procedures at tender and during any planning and construction stages of any contract; ensuring the provision of adequate resources including the appointment of competent persons to apply risk assessment techniques and thereafter to produce complementary control measures both in the form of company health and safety instructions and also specific workplace management plans.
- Arranging with purchasing personnel and senior workplace managers for the assessment of competence of subcontractors to carry out and, or, manage the work involved.
- Ensuring that the company's undertakings are conducted in compliance with company procedures and legislative requirements.
- Designating competent management safety environment representatives (MSERs) and management quality representatives (MQRs) for each workplace to co-ordinate the activities as instructed.
- Establishing and supporting effective health and safety monitoring systems by senior managers.
- Nominating senior managers to carry out investigations of serious accidents, incidents and non-conformance.
- Monitoring health and safety standards both during workplace visits and also by receipt and review of the company's various monitoring systems.

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- Promoting health and safety awareness amongst all employees through leading by example and also monitoring corrective actions subsequent to review of the various monitoring systems.
- Liaising with the HSEQ functions on the progressive development of the health and safety management arrangements.
- Responding to the Regulatory Authorities and registration bodies on any appropriate correspondence or communication.

Workplace management

Within the different contracts of Ecore Construction Management Ltd there are diverse workplaces; as such each may have their own differing management organisations and job titles.

For the purposes of the following sections, the definitions below should be used

- The *senior manager* will be the department manager / section head, contracts or operations manager responsible for the workplace.
- The *workplace manager* will be the manager responsible for the project, workplace, depot, office, factory or plant.
- The *management safety environment representative* (MSER) is the person(s) designated as such in the individual business safety management system. They may be contracts or operations managers, agents, sub-agents, or (senior) contract engineers
- The *management quality representative* (MQR) is the person(s) designated as such in the individual business quality management system. They may be contracts or operations managers, agents, sub-agents, or (senior) contract engineers
- The *supervisor* is a collective term for supervisors, agents or foremen designated as such in the individual business safety management system.

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All employees in the workplace shall:

- Perform their work activities in the manner in which they have been instructed and trained such that they do not place themselves or anyone else at risk.
- Not attempt to neither carry out work of any dangerous nature nor perform any tasks, nor operate any equipment unless they have been correctly trained and authorised to do so, in accordance with recognised procedures.
- Use the correct equipment for their work, ensuring that it is maintained in a safe condition and immediately report any known defects to their supervisor.
- Use the protective clothing and equipment provided for their safety and ensure that it is maintained in a safe condition. All queries on this matter must be directed towards their immediate supervisor.
- Report any unsafe conditions, incidents and near misses and poor working practices to their immediate supervisor so that remedial action can be taken to eliminate risk.
- Report any shortcomings in the instructed protection arrangements to their immediate supervisor as soon as these become apparent.
- Report all accident and personal injuries to their immediate supervisor and if necessary receive medical attention.
- Use the main access ways as provided, comply with relevant safety notices and not enter any area where they may be placed at risk or do not have authorisation to enter.
- Keep their workplace in a safe and tidy condition.
- Conform with the fire fighting and emergency procedures applicable to their place of work.
- Develop a personal concern for safety and if they have any doubt as to their ability to perform a task safely they must inform their immediate supervisor.
- Check with their doctor the risk of any prescribed drugs affecting their fitness for work and inform their supervisor.
- Shall not report for duty or enter the workplace having taken illegal substances (drugs) or consumed alcohol or be under the influence of alcohol.
- Be aware that the quality of their workmanship and materials must be right first time to prevent the possibility of dangerous situations. Any concern must be notified to their immediate supervisor.

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