

# Anti-Bribery & Corruption Policy Statement

2021

Swift Construction Group operates a zero tolerance policy in respect of any form of bribery or corruption. The penalties for bribery and corruption are severe. They include up to 10 years imprisonment for individuals and an unlimited fine for companies as well as adverse publicity and damage to the company's reputation.

This statement of Policy is deliberately succinct. Combating bribery is fundamentally about common sense and creating a culture of ethical behaviour, not burdensome procedures.

The Bribery Act 2010 is not about curtailing legitimate and proportionate entertainment – which is an important device in establishing and maintaining good relationships – it is about preventing bribery and corruption.

Corruption is about the abuse of entrusted power for private gain. This includes bribery, which is the offering, promising or giving of a bribe (active bribery) or accepting a bribe (passive bribery).

There is also the corporate offence of attempting or soliciting to bribe a foreign public official, which is unlikely to apply to Swift Construction Group.

There is also the corporate offence of failing to prevent bribery being carried out on its behalf.

It is the Swift Brickwork Contractors Ltd & Swift Scaffolding Ltd and the Director's belief that by introducing and implementing a zero tolerance policy in respect of bribery and corruption that future dealings and relationships with our Clients will benefit from managing our affairs in an open and transparent manner.

Swift Construction Group approach to bribery and corruption has been adopted by all group companies, including for the avoidance of any doubt, all subsidiaries, joint ventures, partnering arrangements and future business dealings and transactions and sets out the standards expected of all its employees.

As it is expected that all those who work for and with the Group adhere to the Group's zero tolerance approach to bribery and corruption, all references to Swift Group of Companies in this policy applies equally to individuals and companies who are business partners who work with and for the Group.

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## KEY PRINCIPLES

### Integrity

Swift Construction Group Employees and those acting on behalf of the Group must not act in any way that could undermine or give rise to allegations or doubts regarding their integrity or commitment to a zero tolerance approach to bribery and corruption. In particular, employees and business partners must conduct all business transactions and dealings fairly, honestly and openly.

### Transparency

Swift Construction Group Employees and business partners must exercise extreme care to ensure that their business dealings are clear and ethical. This is so important, particularly in relation to business partnerships (in particular relations with agents, intermediaries and the Groups supply chain); gifts, corporate hospitality, entertainment and expenses; donations share dealings; the use of confidential information and conflicts of interest.

Swift Construction Group employees and business partners must adhere, at all times to the Groups purchasing and procurement policies and processes.

### Security and Reporting Bribery

Swift Construction Group encourages employees and business partners to immediately report any suspected wrongdoing. Any information provided shall be treated in strictest confidence and should be reported solely to the appointed compliance officer.

Employees and partners are reassured that no individual or group of persons shall be treated adversely nor shall they suffer any detriment or consequence for refusing to be a party to any form of bribery or corruption. No detriment or consequence shall be levied upon any person or Company for reporting any potential misappropriation, bribery or corruption.

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## Monitoring and Review

The Swift Construction Group, Anti-corruption Compliance Officer, shall monitor the effectiveness of this policy and shall remain committed to ensuring that the Policy and its requirements are reviewed at intervals not exceeding 12 months or where there are significant legislative changes or whenever the matters to which this policy relates become no longer valid.

## Practical Actions

Swift Construction Group shall enforce this policy throughout its employment contracts and in its agreements with our supply chain and business partners. Anti-bribery and corruption provisions will be included in all relevant contracts and agreements with third parties.

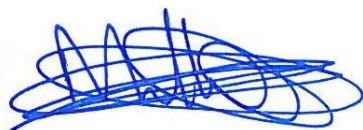
Swift Construction Group will act firmly in respect of any breach of this policy or relevant statutory requirement.

Failure of our supply chain or business partners to comply with the requirements of this Policy will result in the termination of any contractual agreement (automatically where there can be proven a breach of any statutory requirement), resulting ultimately in the serious consideration of any future contracts.

Employees found to be in contravention of this policy shall face disciplinary action resulting in possible termination of employment and the passing of any information to the relevant Authorities with the potential for Criminal and/or Civil proceedings.

Swift Construction Group shall look to its supply chain and business partners to adopt similar policies and encourage comparable arrangements with their own supply chain.

If you have any concerns or queries relating to issues identified within this policy, you should not hesitate to bring them to the attention of our Anti-Corruption Compliance Officer.



M. Walsh

Managing Director

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