



PIPELINES & SERVICES LIMITED

Anti-Bribery Policy

The purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery and corruption regulations, and to ensure that the Company's business is conducted on a socially responsible manner.

We are committed to the highest standards of ethical conduct and integrity in our business activities. This policy outlines the Company's position on preventing and prohibiting bribery, in accordance with the Bribery Act 2010.

Any breach of this policy is likely to constitute a serious disciplinary matter and could result in summary dismissal. It may cause serious damage to our reputation and standing, the Company may also face criminal liability for unlawful actions taken by its employees or associated persons under the Bribery Act 2010. In addition, it could amount to a criminal matter for the individual concerned.

Policy Statement

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal or a breach of trust. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage to induce or influence that individual or company to perform its public or corporate functions or duties in an improper manner.

It is our policy to conduct all of our business in an honest and ethical manner.

We take zero-tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and 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. However, we remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both at home and abroad.

Bribery and corruption are punishable for individuals by up to ten years' imprisonment and a fine, if we are found to have taken part in corruption, we could face an unlimited fine, be excluded from tendering public contracts and face damage to our reputation. We therefore take our legal responsibilities very seriously.

Scope

Who is covered by the policy?

In this policy, third party means any individual or organisation you come into contact with during the course of your work for us, including actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, government and public bodies, including their advisors, representatives and officials, politicians and political parties. This policy applies to all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term, or temporary), staff, volunteers, interns, agents, sponsors, or any other persons associated with us.

This policy covers:

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- Bribes.
- Gifts and hospitality.
- Facilitation payments.
- Political contributions.
- Charitable contributions.
- Intimidation and extortion

Bribes

Employees must not engage in any form of bribery, either directly or through any third party (such as an agent distributor). Specifically, employees must not bribe a foreign public official anywhere in the world.

Gifts and Hospitality

Employees must not offer or give any gift or hospitality:

- Which could be regarded as illegal or improper, or which violates the recipient's policies; or
- To any public employees or government officials or representatives, or politicians or political parties.

Employees may not accept any gift or hospitality from our business partners if:

- It is in cash; or
- There is any suggestion that a return favour will be expected or implied.

If it is not appropriate to decline the offer of a gift, the gift may be accepted, provided it is then declared to the employee's manager and donated to charity.

We appreciate that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift should always be considered.

Within these parameters, local management may define specific guidelines and policies to reflect local professional and industry standards.

Where this policy requires written approval to be given, the Company Directors shall put in place a process to maintain a register of all such approvals.

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.

You must declare and keep a written record of all hospitality or gifts accepted or offered, which will be subject to managerial review.

You must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted and specifically record the reason for the expenditure.

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.

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How to Raise a Concern

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any queries or concerns, these should be raised with your line manager OR the Company Directors.

What to do if You are a Victim of Bribery or Corruption

It is important that you tell the Company Directors as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

The Protection

Employees who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about the possible repercussions.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

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 or potential 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 the Directors immediately. If the matter is not remedied, and you are an employee, you should raise it formally using the company's Grievance Procedure.

Training and Communication

Training on this policy forms part of the induction process for all new employees. All existing employees will receive regular, relevant training on how to implement and adhere to this policy. In addition, all employees will be asked to formally accept conformance to this policy on an annual basis.

Our zero-tolerance approach to bribery and corruption to bribery and corruption must be communicated to all suppliers, contractor and business partners at the outset of our business relationship with them and as appropriate thereafter.

Who is Responsible for the Policy

The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations and that all those under our control comply.

The Company Directors have primary and day-to-day responsibility for implementing this policy, and for monitoring its use and effectiveness and dealing with any queries on its interpretation.

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.



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Monitoring and Review

The Company Directors will, monitor the effectiveness and review the implementation of this policy, regular considering it suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

All employees are responsible for the success of this policy and should ensure they use it to disclose any suspected danger of wrongdoing.

Employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Company Directors.

This policy does not form part of any employee's contract and may be amended at any time.

A handwritten signature in black ink, appearing to read 'Simon Mansley'.

Simon Mansley
Managing Director
P&H Pipelines & Services Ltd
8th January 2025