



IM021 Bribery, Fraud & Malpractice Policy

General Statement

All RJT employees, subcontractors and suppliers must comply with the Policy.

The Policy extends to RJT having proportionate procedures to ensure that all service providers (including subcontractors and suppliers) comply with RJT's bribery, fraud & malpractice policies. Where RJT has a minority interest we will encourage the application of the Policy amongst our business partners including joint venture partners.

It is essential that RJT conduct an effective process of due diligence prior to entering into significant business relationships and that we keep a record of this process.

Any breach of the Policy is likely to constitute a serious disciplinary, contractual and criminal matter for the individual concerned and may cause serious damage to the reputation and standing of RJT

RJT does not tolerate, permit, or engage in bribery, corruption, or improper payments of any kind in our business dealings, both with public officials and people in the private sector. Ethical behaviour is in the long-term interests of our Company.

RJT Excavations is committed to the following key bribery, fraud & malpractice principles:

- Will carry out business fairly, honestly and openly.
- RJT will not give or offer any money, gift, hospitality or other advantage to any person carrying out a business or public role, or to a third party associated with that person, to get them to do something improper.
- RJT will not use intermediaries or subcontractors for the purpose of committing acts of bribery.
- RJT do not allow employees to accept money, gifts, hospitality and other advantages from business associates, actual or potential suppliers, or service providers which are intended to influence a business decision or transaction in some improper way.
- Any employee found to be in breach of these principles will face disciplinary action.
- RJT will avoid doing business with others who do not commit to conducting business without bribery.
- RJT are committed to a programme to counter the risk of RJT being involved in bribery.
- General guidance will be cascaded through senior management and line managers and will be made available to all employees.

The Directors will monitor the adequacy of this Policy and associated processes and procedures on an annual basis.

Authorised by:

A handwritten signature in black ink, appearing to be 'G. Jones', is written over the text 'Authorised by:'.

Position: Managing Director

Date Approved: 10th May 2018

Review Date: 26th April 2019