

## ANTI-BRIBERY POLICY

### Overview

The purpose of this policy is to ensure that all of our clients, our staff, third parties, and the public are safe in the knowledge that Milestone does not tolerate and has no involvement in bribery or corruption of any sort.

### Scope

Corruption is the misuse of office or power for monetary gain or gain of status. A bribe is an inducement or reward offered, promised or provided to gain commercial, contractual, regulatory or personal advantage (whether or not that advantage was in fact gained).

### POLICY STATEMENT

- ◆ It is our policy to conduct all 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 business dealings and relationships wherever we operate, using effective systems to counter bribery.
- ◆ We will uphold all laws relevant to countering bribery and corruption in all areas in which we operate and remain bound by the UK law including the Bribery Act 2010.
- ◆ Bribery and corruption are punishable for individuals by up to ten years' imprisonment and if we are found to have taken part in corruption, we could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation. We therefore take our legal responsibilities very seriously.
- ◆ In this policy, third party means any individual or organisation that comes into contact with us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

### PEOPLE COVERED BY THE POLICY

All individuals working at all levels and grades, including partners, senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, homeworkers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as workers in this policy)

Third parties. Where we engage with third parties, we will undertake appropriate steps to ensure that they comply with the principles set out in this policy.

## UNACCEPTABLE BEHAVIOUR

We do not (nor do we employ someone) to:

- ◆ give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given.
- ◆ give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to “facilitate” or expedite a routine procedure.
- ◆ accept payment from a third party that we know or suspect is offered with the expectation that it will obtain a business advantage for them.
- ◆ accept a gift or hospitality from a third party if we know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return.
- ◆ threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
- ◆ engage in any activity that might lead to a breach of this policy.

## FACILITATION PAYMENTS AND KICKBACKS

We do not make, and will not accept, facilitation payments or “kickbacks” of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official.

Kickbacks are typically payments made in return for a business favour or advantage. We avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.

## DONATIONS

We do not make contributions to political parties. We only make charitable donations that are legal and ethical under local laws and practices.

## HOW TO RAISE A CONCERN

We encourage raising with us concerns about any issue or suspicion of the above at the earliest possible time. Any concerns or issues should be referred to our Directors or members of staff, where we can escalate this.

## MONITORING AND REVIEW

We will monitor the effectiveness and review the implementation of this policy regularly, considering its suitability, adequacy and effectiveness.

Underhill Project Controls Limited Trading as MILESTONE



Mick Underhill

Director

Issue 1

April 2021



Sally Calverley

Director

Issue 1

April 2021