

Vale Southern Construction Anti-Bribery & Corruption Policy

Vale Southern Construction Limited (The Company) is a principal contractor based in Portsmouth, providing services across the South.

The Company is committed to maintaining the highest ethical standards, taking a zero tolerance approach to bribery and corruption. The policy below sets out the expectations of all employees and agents of The Company in regard to anti-bribery and corruption, specifically, in relation to The Bribery Act 2010.

It should be noted that bribery need not be actual money, it is any form of advantage offered, requested or received in relation to an activity being undertaken. Furthermore, a bribe which is not personally received i.e. going to a beneficiary is still considered a bribe.

Our Policy:

- Do not request, agree or accept bribes
- Do not offer, promise or pay bribes

This policy applies to any employees, agents, suppliers or customers of The Company. Failure to comply with this policy is strictly forbidden. Employees have a duty to inform senior management should any of the above be called into question.

Oliver West

Managing Director

Date: 10/12/2019