7th September 2026

REFERENCE: P - 009

Wallace Groundwork’s Ltd

Policy

ANTI BRIBERY & CORRUPTION POLICY

Wallace Groundwork's Ltd
The Hub at Gladstone Buildings Broadleys
Chesterfield
Derbyshire
United Kingdom

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1. General Statement of Intent

Our Company is committed to conducting its business activities with the highest level of integrity and ethical standards. We have a zero-tolerance approach towards bribery and corruption in all forms and are dedicated to preventing such practices within our organisation and in our interactions with external parties.

- Comply with all applicable laws, regulations, and international standards related to anti-bribery and corruption.
- Adhere to the provisions of the Foreign Corrupt Practices Act (FCPA), UK Bribery Act, and any other relevant anti-corruption legislation.
- Prohibit all forms of bribery, including offering, giving, receiving, or soliciting bribes, whether in monetary or non-monetary forms.
- Maintain transparent and accountable policies and procedures regarding the acceptance and offering of gifts, hospitality, donations, or sponsorships.
- Strictly prohibit the use of facilitation payments or "grease payments" to expedite routine actions or services.
- Encourage employees to report any requests or instances of facilitation payments to the appropriate channels within the organisation.
- Conduct comprehensive due diligence and risk assessments on all third parties, including suppliers, agents, consultants, and business partners, to ensure their adherence to anti-bribery and corruption principles.
- Only engage with third parties who share our commitment to ethical conduct and compliance.
- Encourage employees to report any suspected or actual instances of bribery, corruption, or unethical conduct through confidential reporting channels.
- Provide protection and non-retaliation measures for individuals who report in good faith.
- Provide regular training and awareness programs to employees, contractors, and relevant stakeholders to ensure a clear understanding of anti-bribery and corruption policies, procedures, and legal obligations.

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- Foster a culture of integrity and ethical behaviour throughout the organisation.
- Implement effective internal controls, audits, and monitoring mechanisms to detect and prevent bribery and corruption.
- Take appropriate disciplinary action against individuals found to be involved in bribery or corrupt practices, up to and including termination of employment and legal action
- Regularly review and update our anti-bribery and corruption policies and procedures to align with evolving legal and regulatory requirements.

By enforcing this Anti-Bribery & Corruption Policy, we aim to maintain our reputation for ethical business conduct, protect our employees and stakeholders, and contribute to a global environment that fosters fair and transparent business practices.

Author	Nicola Parker
Author Job Role/Position	General Manager
Author Signature	
Signature Date	7th September 2026

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2. Responsibilities

The functions of the company are designated to the following persons accordingly.

Responsibility	Contact Name	Contact Details
Overall Anti Bribery & Corruption Policy Implementation	Peter Wallace	07968357627 p.wallace@wallacegroundworks.com
	Nicola Parker	07496299614 n.parker@wallacegroundworks.com

3. Arrangements

3.1. Compliance with Laws and Regulations

Our company is fully committed to compliance with all applicable laws, regulations, and international standards related to anti-bribery and corruption. We recognise the importance of upholding the provisions set forth in the Foreign Corrupt Practices Act (FCPA), UK Bribery Act, and other relevant anti-corruption legislation. Our company will diligently monitor changes and updates to these laws and regulations to ensure ongoing adherence. We will establish and maintain robust internal controls, policies, and procedures that align with legal requirements, promoting a culture of transparency, accountability, and ethical conduct. Through regular training, awareness programs, and internal communication, we will ensure that all employees are well-informed about their obligations and responsibilities regarding anti-bribery and corruption compliance. Compliance with laws and regulations is a fundamental principle of our organisation, and we are dedicated to continuously reviewing and improving our practices to meet the highest standards of integrity and legality.

3.2. Gifts, Hospitality, and Expenses

We recognise the potential risks associated with gifts, hospitality, and expenses and are committed to preventing bribery and corruption in these areas. We acknowledge that offering or receiving gifts, hospitality, donations, or sponsorships can create conflicts of interest or give the appearance of impropriety. Therefore, we have established clear policies and procedures to ensure transparency, accountability, and ethical conduct in these matters.

All gifts, whether given or received, must be within legal limits and aligned with customary business practices. Gifts of cash or cash equivalents are strictly prohibited, as they can easily be perceived as bribes. Prior approval must be obtained from appropriate management levels for any gifts that exceed pre-determined thresholds.

Hospitality offered or received must be reasonable, proportionate, and directly related to legitimate business purposes. Employees should exercise good judgment and ensure that hospitality is not used to unduly influence business decisions or gain unfair advantages. Detailed records of all hospitality events must be maintained for transparency and auditing purposes, including attendees and purpose.

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All expenses incurred on behalf of the company must be legitimate, properly authorised, and accurately recorded. Expense claims must be supported by appropriate documentation, such as receipts or invoices, and comply with company policies and guidelines. Expenses should be reasonable and directly related to business purposes, with no element of personal benefit or gain.

Third parties, such as suppliers, agents, consultants, and business partners, should be subjected to thorough due vetting procedures to ensure their commitment to ethical conduct and compliance. Contracts or agreements with third parties should include clear provisions prohibiting bribery and corruption, outlining their responsibilities, and establishing mechanisms for reporting any suspected misconduct.

3.3. Facilitation Payments

The company is committed to preventing bribery and corruption, including the prohibition of facilitation payments. Facilitation payments, also known as "grease payments," are small payments or bribes made to expedite routine actions or services that a person is already obligated to perform. We recognise that facilitation payments undermine the principles of fairness, transparency, and ethical conduct that our organisation upholds. Therefore, we have implemented the following measures to prevent and address bribery matters related to facilitation payments:

Facilitation payments are strictly prohibited within our organisation, regardless of their size or purpose. Employees, contractors, agents, and any other company representatives are prohibited from making or accepting facilitation payments.

We provide comprehensive training programs to all employees and relevant stakeholders to raise awareness about facilitation payments, their risks, and the legal implications associated with them. This training emphasises the importance of refusing and reporting any requests for facilitation payments promptly.

We encourage all employees to report any instances or suspicions of facilitation payments through confidential reporting mechanisms, ensuring protection against retaliation. Whistleblower protection policies are in place to safeguard individuals who report in good faith.

We will conduct rigorous due diligence procedures on third parties, such as suppliers, agents, consultants, and business partners, to ensure they adhere to our anti-bribery and corruption standards. Third-party agreements contain explicit provisions prohibiting facilitation payments and other corrupt practices.

Any violations of our anti-bribery and corruption policies, including facilitation payments, are thoroughly investigated, and appropriate disciplinary actions are taken, which may include termination of employment or contract and legal action, as applicable.

3.4. Third Party Vetting

The company is committed to preventing bribery and corruption by establishing robust vetting procedures for third parties, including suppliers, subcontractors, consultants, business partners, and other entities we engage in business relationships with. We recognise that third parties can pose significant risks in relation to bribery and corruption, and therefore, we have implemented the following arrangements to ensure their compliance with our anti-bribery and corruption standards:

We conduct thorough risk assessments to identify and evaluate the potential risks associated with engaging third parties. Factors such as the nature of the business relationship, the country of operation, the industry sector, and the third

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party's reputation are considered during the risk assessment process.

Vetting measures may include reviewing public records, conducting interviews, verifying credentials, assessing financial stability, and assessing the third party's compliance with anti-bribery and corruption laws and regulations.

We implement ongoing monitoring and auditing processes to assess the ongoing compliance of third parties with our anti-bribery and corruption standards. Regular reviews of the business relationship and periodic audits are conducted to detect any irregularities or indications of bribery or corruption.

If any third party is found to be involved in bribery or corruption, we take immediate and appropriate actions, which may include terminating the business relationship, reporting the incident to relevant authorities, and seeking legal remedies as necessary.

3.5. Incident Reporting & Whistleblowing

Our company is committed to maintaining a culture of transparency, accountability, and ethical conduct. We encourage all employees, contractors, suppliers, and stakeholders to report any suspicions, concerns, or incidents related to bribery and corruption promptly and without fear of retaliation. Our policy aims to provide a clear framework for reporting and whistleblowing, ensuring that all reports are thoroughly and impartially investigated. The following arrangements are in place to facilitate reporting and whistleblowing:

We have established a confidential reporting procedure that allows individuals to report suspicions, concerns, or incidents of bribery and corruption. Any individual can contact the company on our main contact number and request to "***Report a serious matter anonymously***", from here this call will be taken by a senior member of staff who will record all information without the caller being asked for identifying details.

We strictly prohibit any form of retaliation against individuals who report in good faith or assist in the investigation of bribery and corruption allegations. We provide assurance that those who report or participate in investigations will be protected and their identity will be kept confidential to the extent permitted by law.

All reports of bribery and corruption will be promptly and thoroughly investigated by competent and impartial individuals. Investigations will be conducted in a confidential manner, and the rights of all parties involved will be respected. Investigations will follow established procedures and may involve gathering evidence, interviewing relevant individuals, and seeking external expertise, if necessary.

If an investigation substantiates allegations of bribery or corruption, appropriate disciplinary actions will be taken against the individuals or parties involved, in accordance with applicable laws and internal procedures. Disciplinary actions may include but are not limited to termination, legal action, restitution, and revision of internal controls or policies to prevent future occurrences.

We provide training and awareness programs to educate employees and stakeholders about the importance of reporting and whistleblowing, as well as the procedures for making a report.

3.6. Training and Awareness

Our company recognises that training and awareness are key elements in preventing bribery and corruption. We are committed to providing comprehensive training programs and promoting a culture of ethics and compliance throughout our organisation. The following arrangements are in place to ensure effective training and awareness:

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We have developed and implemented training programs that cover anti-bribery and corruption policies, laws, and regulations. Training is provided to all employees, contractors, and relevant stakeholders, including those in high-risk positions or functions.

Training covers various topics, including the definition of bribery and corruption, red flags and warning signs, consequences of non-compliance, reporting procedures, and the importance of ethical business conduct. Training sessions are conducted periodically to ensure that employees receive regular updates and reinforcement of anti-bribery and corruption policies.

New employees and contractors receive training as part of their onboarding process, and refresher training is provided on an ongoing basis. We utilise a combination of training delivery methods to cater to different learning preferences and operational requirements including E-learning, Toolbox Talks and other methods.

Senior management and leadership actively participate in and support the training initiatives, demonstrating their commitment to ethical behaviour and compliance. Leaders promote a culture of ethics and integrity through their words, and actions, and by setting a positive example for employees.

We provide employees with access to guidance documents, policies, and resources related to anti-bribery and corruption. These materials offer practical advice, case studies, and examples to help employees understand and address potential bribery and corruption situations.

3.7. Fraud Prevention

The company is committed to preventing fraud and maintaining the highest standards of honesty, integrity, and transparency in all business activities. Fraud undermines trust, damages reputation, and exposes the organisation to financial and legal risk. We therefore operate a zero tolerance approach to all forms of fraudulent activity.

Fraud may include, but is not limited to, false representation, theft, misappropriation of assets, falsification of records, expense fraud, procurement fraud, or deliberate misuse of company systems or information. To prevent and address fraud, the company has implemented the following measures:

All employees, contractors, agents, and representatives are expected to act honestly and ethically at all times and must not engage in any fraudulent behaviour for personal gain or on behalf of the organisation.

Clear financial and operational controls are in place to reduce the risk of fraud, including segregation of duties, approval processes, and appropriate oversight of financial transactions, expenses, and procurement activities.

The company provides training and awareness to employees on fraud risks, how fraud may occur, and the importance of reporting concerns promptly. This includes recognising warning signs and understanding individual responsibilities in preventing fraud.

Employees are encouraged to report any suspected or actual fraudulent activity through confidential reporting channels. Reports can be made without fear of retaliation, and whistleblower protection arrangements are in place to support individuals who raise concerns in good faith.

Appropriate due diligence is undertaken on third parties, including suppliers, subcontractors, and business partners, to reduce the risk of fraud. Contracts and agreements include provisions requiring ethical conduct and compliance with company policies.

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All reported or suspected instances of fraud are investigated thoroughly and objectively. Where fraud is identified, appropriate disciplinary action will be taken, which may include dismissal, termination of contracts, recovery of losses, and referral to law enforcement authorities where necessary.

The company regularly reviews its controls, procedures, and systems to ensure they remain effective in preventing and detecting fraud and to support continuous improvement in governance and risk management.

3.8. Competition Law Compliance and Prevention of Anti-Competitive Behaviour

The company is committed to conducting all business activities fairly, ethically, and in full compliance with all applicable competition and antitrust legislation. We recognise that anti-competitive behaviour undermines fair market practices, restricts customer choice, damages business integrity, and can result in significant legal, financial, and reputational consequences. As such, we maintain robust arrangements to prevent, detect, and address any conduct that may breach competition law.

We require all employees, contractors, suppliers, and representatives acting on behalf of the company to operate independently and competitively at all times. The company strictly prohibits any agreements, discussions, understandings, or arrangements with competitors that could restrict competition or distort market conditions. This includes, but is not limited to, price fixing, market sharing, customer allocation, bid rigging, cover pricing, collusive tendering, or the exchange of commercially sensitive information.

To ensure compliance with competition law, all tenders, quotations, and commercial proposals are developed independently and based solely on legitimate business considerations. Employees involved in estimating, procurement, tendering, sales, business development, and contract management are expected to exercise particular care when interacting with competitors, customers, suppliers, and industry groups to ensure that no actions could be interpreted as anti-competitive.

The company maintains appropriate oversight of its commercial activities, business relationships, and procurement processes to identify potential competition law risks. Commercially sensitive information, including pricing structures, profit margins, future business plans, tender information, customer data, and strategic objectives, is protected and only shared where there is a legitimate business need and appropriate authorisation.

Training, guidance, and awareness initiatives are provided to ensure that employees understand their obligations under competition law and are able to recognise situations that may present a compliance risk. The company promotes a culture of openness and accountability, encouraging employees to seek advice whenever they are uncertain about the legality of a proposed business activity or commercial arrangement.

Employees are encouraged to report any concerns, suspicions, or requests that may involve anti-competitive behaviour through the company's established reporting procedures. All reports will be treated seriously, investigated appropriately, and handled confidentially wherever possible. Individuals who raise concerns in good faith will be protected from retaliation or adverse treatment.

Any suspected breach of competition law will be investigated promptly and impartially. Where non-compliance is identified, the company will take appropriate corrective and disciplinary action, which may include termination of employment or contracts, reporting matters to the relevant regulatory authorities, and pursuing legal remedies where appropriate. The company will regularly review its competition law compliance arrangements to ensure they remain effective, proportionate, and aligned with current legal and regulatory requirements.

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