



Anti-Bribery and Anti-Corruption Policy

Purpose

RED Industries Group is committed to doing business the right way, with honesty, transparency, and integrity at every level.

We believe ethical conduct is essential to building trust with our customers, suppliers, and communities, and we expect the same commitment from everyone who works for or with RED.

We have a zero tolerance approach to bribery and corruption in any form. This policy outlines the behaviours we expect, the legal duties we must uphold, and the steps we all take to prevent corruption and promote a culture of accountability and fairness.

Scope

This policy applies to:

- All RED employees (permanent, fixed-term, temporary, and agency workers)
- Directors, officers, and managers
- Contractors, consultants, agents, and all third parties acting on RED's behalf (collectively, "associated persons" for the purpose of this policy).

It applies to conduct anywhere in the world, including activities outside the UK undertaken by RED employees or those acting on RED's behalf.

Policy Statement and Legal Context

Under the Bribery Act 2010, it is an offence to:

- Offer, promise, or give a bribe to induce improper performance of a relevant function
- Request, agree to receive, or accept a bribe as a reward for improper performance
- Bribe a foreign public official to obtain or retain business or an advantage
- Fail to prevent bribery by associated persons acting for or on behalf of the organisation

RED will not tolerate bribery or corruption by anyone working for or on behalf of the company. Compliance with this policy is mandatory. Employees and associated persons who breach this policy may face disciplinary action, including dismissal. RED may also terminate contractual relationships with third parties who breach this policy.

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Guiding Principles

Zero Tolerance

RED's approach to bribery and corruption is absolute. No employee or associated person should engage in corrupt activity to gain business advantage, secure contracts, or influence business decisions.

Individual Responsibility

All employees and associated persons must:

- Understand and comply with this policy
- Avoid any situation that could give rise to bribery or corruption
- Act transparently and in good faith at all times

Gifts, Hospitality and Expenses

Gifts and hospitality can be legitimate ways to build business relationships, but they must never be used to influence, or appear to influence, a business decision.

Low-value, everyday hospitality

- Modest, routine hospitality such as a coffee, soft drink, or occasional shared chocolates at site is acceptable and does not need to be recorded, provided it is clearly proportionate and not linked to any decision-making or tender activity.

Gifts and hospitality that must be recorded

- Any gift or hospitality with an estimated value over £25 must be recorded in RED's Gifts and Hospitality Register.
- Line managers are responsible for reviewing and approving these offers in the first instance and escalating anything that may present a risk.

Gifts and hospitality requiring CFO approval

- Any gift or hospitality with an estimated value over £100, or which could be considered sensitive (for example where a supplier, customer, or public official is involved in a live or upcoming decision), must be approved in advance by the Chief Financial Officer (or nominated deputy) and recorded in the register.
- Repeated low-value offers from the same source that together exceed £100 in a 12-month period should also be flagged for review.

Cash or cash equivalents (such as vouchers or gift cards) must never be accepted. Where declining a gift would cause clear cultural or diplomatic offence, the gift may be accepted but must be reported and handled in line with this policy.

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Facilitation Payments and Kickbacks

RED **does not permit** facilitation payments or kickbacks under any circumstances. Facilitation payments are small unofficial payments intended to expedite routine government actions, and kickbacks are improper payments in return for preferential treatment. All such payments are prohibited.

If an employee feels that refusing such a payment might endanger their own or others' safety, they must report this immediately to their line manager or HR.

Charitable Contributions

Charitable giving is encouraged where it is lawful, ethical, and transparent. However, employees must ensure that:

- Contributions are not used to disguise bribery
- All donations are approved in writing by the People Team
- Records are maintained to demonstrate the purpose and legitimacy of the contribution

Political Contributions

RED does not make donations to political parties, candidates, or political organisations. Such contributions could be perceived as attempts to gain undue influence in public affairs.

Reporting Concerns

If you suspect bribery or corruption, or you are asked to commit such an act, you must:

- Report it immediately to your line manager or Chief Financial Officer
- If you're uncomfortable doing so, use RED's Whistleblowing Policy to raise concerns confidentially

RED will support anyone reporting concerns in good faith, even if the investigation later finds that no wrongdoing occurred. Retaliation or detrimental treatment against anyone raising a concern is prohibited.

Training and Communication

RED will provide anti-bribery training:

- As part of onboarding
- Regular refresher training for all relevant employees
- Additional training for those in high-risk roles

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RED's zero-tolerance approach will be communicated to third parties, including suppliers, contractors, agents, and partners, as appropriate.

Record Keeping and Controls

RED will maintain accurate financial records and internal controls to demonstrate compliance with this policy. This includes documentation of:

- Hospitality and gift registers
- Charitable contributions
- Due diligence checks on third parties
- Reports and investigations of suspected bribery

Effective record keeping supports transparency and reduces legal risk under the Bribery Act.

Monitoring and Review

This policy will be reviewed regularly to ensure it meets legislative and operational requirements. RED may update it in response to changes in law, business operations, or risk profile.

Consequences of Non-Compliance

Breaches of this policy will be treated seriously and may result in:

- Disciplinary action, including summary dismissal
- Contract termination with third parties
- Legal action under the Bribery Act, carrying potential fines and imprisonment

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