



**HARMONIX CONSTRUCTION LTD**

Anti-bribery Policy  
April 2022

**Date: April 2022**

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## **PURPOSE**

As defined by the Bribery Act 2010, bribery is “giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for having already done so.” The purpose of this policy is to unequivocally denounce bribery and outline the zero tolerance approach we have to giving or receiving bribes in each level of our organization.

This policy applies to all employees, sub-contractors, suppliers, and any other members of staff that work for Harmonix in any capacity. Breaches of this policy will be handled in line with the company’s disciplinary procedures and, in some cases, legal proceedings. Breaches can include, but aren’t limited to, offering cash, services, employment, donations, or contributions (outside of what can legitimately be offered) in order to influence another person’s decision-making. This does not include genuine hospitality or similar business expenditure as mentioned in the Bribery Act 2010, though these should only occur at a reasonable level, infrequently and always be disclosed.

## **IN PRACTICE**

We are establishing this inaugural policy as one of the ways to hold ourselves accountable to ensuring the absence of bribery throughout our business. It will be reviewed at least annually to maintain Harmonix’s dedication to keeping anti-bribery as one of our forefront ideals. In addition to this policy, we will facilitate keeping bribery out of our business in the following ways:

- Widely distributing this policy throughout our office, website and project sites so every person involved in the business has easy access to it
- Ensuring it’s a top agenda item during meetings, especially regarding new projects, beginning new sites, hiring sub-contractors etc.
- Maintaining a zero tolerance policy for bribery
- Facilitating and operating an anonymous channel for employees to report any behaviour that goes against this policy
- Attaining a written account of events from relevant parties if an instance of bribery occurs
- Providing training opportunities for employees to learn more about bribery in the workplace

Ultimately, Harmonix does not condone or accept bribery in any form, from any member or associate of our organisation. Breaches of this policy will be handled in line with the company’s disciplinary procedures and, in some instances, legal proceedings.

If you have any questions, comments or suggestions related to this policy, please get in contact with Harmonix’s Procurement and Sustainability Manager Luke White at [luke@harmonixconstruction.com](mailto:luke@harmonixconstruction.com).

April 2022. To be revised no later than April 2023.