

To ensure compliance with the policy by all relevant officers and employees and all associated persons the policy will be reviewed annually to ensure it is suitable, effective and consistently implemented.

Palmers Scaffolding UK Ltd recognises that the giving or receiving of bribes is contrary to the Bribery Act 2010 (the "Act") and can play no part in the way in which Palmers carries out its business.

This Policy applies to Palmers, their officers, directors and employees whether permanent or temporary. It also applies to all Palmers supply chain partners, including agents, advisers, consultants, joint-venture partners and sub-contractors (together "Associated Persons").

To achieve this, Palmers will: -

- Not engage in any form of bribery or corruption.
- Not offer, provide, authorise, request or receive bribes or anything that could give the perception of a bribe.
- Prohibit its officers, employees and Associated Persons from offering, making or paying any "facilitation payments" to any third party including, but not limited to, foreign public officials. All Palmers officers and employees must report to the Company Secretary any request by a third party for a facilitation payment.
- Only contract with Associated Persons and engage with business partners who demonstrate at all times business integrity and who practice ethical conduct which meets the standards set out in this Policy and all applicable laws and regulations.
- Ensure that officers and employees (whether permanent or temporary) in commercial or customer or supply chain facing positions receive training on anti-bribery compliance.

It is reinforced that Palmers considers a breach of this Policy as a serious offence. Any violation will result in disciplinary action, up to and including dismissal of an individual in appropriate circumstances. Breach of the Act may also lead to penalties including fines and/or imprisonment being enforced against the individual by the police.

CEO/MD  
17<sup>th</sup> July 2024



Michael Carr