



## IVOR KING CIVIL ENGINEERING CONTRACTORS LTD

### ANTI-COMPETITIVENESS, FRAUD, BRIBERY & CORRUPTION POLICY

#### 1. Policy

- 1.1. This policy relates to the activities of Ivor King Civil Engineering Contractors Ltd, its employees, and any parties over which it can reasonably be expected to exercise control.
- 1.2. This Anti-Competitiveness, Fraud, Bribery and Corruption Policy sets out the standards expected to ensure compliance with the Competition Act 1998, the Bribery Act 2010, and the Fraud Act 2006.
- 1.3. References to "fraud" include acts of bribery, corruption, anti-competitive behaviour, collusion, or any other dishonest or unlawful conduct.
- 1.4. Complaints unrelated to fraud, bribery, corruption, or competition matters should be raised using the Complaints Policy HR52.
- 1.5. This policy will be reviewed every 12 months.

#### 2. Definitions

- 2.1. Fraud refers to the use of deception to cause loss, gain advantage, or secure unwarranted personal benefit.
- 2.2. Bribery is an inducement, advantage or reward offered, promised or provided to gain commercial, contractual or personal advantage.
- 2.3. Corruption is the abuse of entrusted power for private gain.
- 2.4. Anti-competitive behaviour includes agreements or practices between businesses to avoid competition, such as price-fixing, bid-rigging, limiting production, sharing customers or markets, and informal "gentlemen's agreements".

#### 3. Principles

- 3.1. The organisation is committed to preventing anti-competitiveness, fraud, bribery and corruption, and promoting a transparent, ethical culture.
- 3.2. The organisation operates a zero-tolerance approach and requires all staff to act honestly, lawfully and with integrity and to report suspicious activity.

#### 4. Governance, Controls & Compliance

##### 4.1. Designated Responsibilities

- HR are appointed as Counter Fraud Champions.
- The Group Managing Director holds responsibility for ensuring robust anti-fraud, bribery, corruption and competition-law processes.
- The CEO acts as the designated escalation point for serious concerns.

##### 4.2. Processes for Controlling Fraud & Malpractice

- Segregation of duties and approval limits
- Procurement and tendering controls
- Financial monitoring and audit checks
- Staff vetting and pre-employment verification
- Conflict of interest declarations
- Mandatory staff training

##### 4.3. Bribery Act 2010 Compliance & Review

- Annual risk assessments (DC0195)
- Review of gifts, hospitality & conflict of interest registers

- Policies on facilitation payments and third-party engagements
- Training at induction and refresher intervals
- Review via Cedric legal compliance register

#### 4.4. Ensuring Compliance with Competition Law

- Monitoring of tendering and commercial practices
- Prohibition of all collusion or informal competitor agreements
- Guidance and training on acceptable market behaviour
- Periodic review via Cedric register

#### 4.5. Arrangements to Detect & Avoid Anti-Competitive Behaviour

- Oversight of bidding processes
- Review of supplier and subcontractor relationships
- Regular audits
- Whistleblowing mechanisms
- Investigation of any behaviours that may reduce market competition

### 5. Reporting Suspicions

5.1. All suspicions must be raised immediately through the Whistleblowing Policy HR47.

5.2. If inappropriate to raise concerns internally, they may be submitted confidentially to the CEO. Confidentiality and protection for whistleblowers will be upheld.

### 6. Investigation of Allegations

6.1. All allegations will be formally assessed.

6.2. Investigations may involve HR, senior management, legal advisors, or law enforcement.

6.3. Appropriate actions will be taken where wrongdoing is found.

### 7. Records, Reporting & Review

7.1. All referrals, allegations, and outcomes will be recorded and monitored.

7.2. Cedric compliance register will monitor controls and actions.

7.3. This policy will be reviewed every 12 months.



Simon King

CEO

26/02/2026

<b>Change Tracker</b>			
<b>Date</b>	<b>Reason</b>	<b>Change</b>	<b>Who</b>
25/11/2022	Review	Updated	RH
28/11/2023	Review	Updated	RH
11/01/2024	Updated	Change in Signature	RH/MB
27/03/2024	Updated	to include fraud & corruption	DJS
09/05/2024	Updated	to include anti competitiveness	DJS
12/02/2025	Updated	Change in Signature	RH
30/04/2025	Reviewed	Updated	RH
26/02/2026	Updated	Additional content	MW/RH