HORIZON
CONSTRUCTION

Anti-bribery and Corruption Policy

Horizon Construction Group and its subsidiary companies operate a zero-tolerance approach to bribery and corruption and are committed to conducting all business activities with honesty, integrity and transparency. Bribery includes offering, promising, giving, requesting or accepting any financial or other advantage to induce or reward improper conduct. This extends to gifts, hospitality or any form of incentive intended to influence business decisions. Corruption is any dishonest or unlawful conduct by those in positions of trust or authority.

We are committed to:

- Complying with all applicable laws, including the Bribery Act 2010
- Preventing bribery and corruption in all areas of our business and operations
- Carrying out due diligence on business partners and third parties
- Maintaining clear procedures for gifts, hospitality and expenses
- Keeping accurate records of all transactions and business dealings
- Providing training and guidance to those working on our behalf
- Investigating any suspected breaches and taking appropriate action

All employees, contractors and third parties acting on our behalf must:

- Act honestly and with integrity at all times
- Never offer, give, solicit or accept bribes or improper inducements
- Avoid facilitation payments or kickbacks under any circumstances
- Ensure that any gifts or hospitality are reasonable, proportionate and properly authorised
- Report any concerns or suspected breaches promptly through the appropriate reporting channels

We encourage a culture of openness and will support anyone who raises concerns in good faith. Retaliation against individuals who report suspected wrongdoing will not be tolerated. Breaches of this policy may result in disciplinary action, including dismissal, or termination of business relationships. Senior management is responsible for overseeing this policy and ensuring its effective implementation.

Signed



Mitchell Fletcher

Construction Director

Date: 05/01/2026