

Anti-Bribery and Corruption Policy

Revised: September 2025

Introduction

The Bribery Act 2010 ("the Act") imposes extensive obligations on all commercial organisations to ensure that they have adequate procedures in place to prevent bribery from occurring within their organisation. Jacobs Massey Ltd (JacobsMassey) is committed to compliance with the Act and this policy. Bribery and corruption are punishable for individuals by up to ten years imprisonment. If JacobsMassey is found to have taken part in corruption, we could face an unlimited fine and suffer incalculable damage to our reputation.

Policy Statement

JacobsMassey is committed to acting with integrity in all our business dealings and relationships and to implementing effective systems to prevent bribery. We will uphold all laws relevant to countering bribery and corruption, including the Act, in every aspect of our conduct, including our dealings with public and private sector organisations.

The purpose of this policy is to:

- Set out the responsibilities of JacobsMassey and those working for us, or in positions facilitated by us.
- Prevent bribery and corruption.
- Provide information and guidance to those working for us on recognising and dealing with bribery and corruption issues.

In this policy, "third party" means any individual or organisation you encounter during the course of your work for JacobsMassey, and includes actual and potential clients, companies, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

Who Is covered by this policy?

This policy applies to all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed term or temporary), consultants, contractors, trainees, seconded staff, homeworkers, casual workers and agency staff, volunteers, interns, agents, or any other person associated with JacobsMassey.

Monitoring compliance

JacobsMassey's Managing Director, Graeme Massey, is our designated Compliance Officer and has responsibility for ensuring compliance with this policy and will review its contents on a regular basis.

What Is Bribery?

A bribe is an inducement or reward of a financial or other advantage, that is offered, promised, or provided to a person to gain any commercial, contractual, regulatory or personal advantage through the improper performance of a relevant function or activity as a result of the bribe.

- “Financial or other advantage”, although not defined in the Act, means payments, gifts, hospitality, or anything else that could be reasonably perceived as an “advantage” as understood by its normal, everyday meaning.
- “Improper performance” means performance that breaches expectations of good faith, impartiality, or alignment with JacobsMassey’s standards.
- “Relevant function or activity” means any function of a public nature, connected with a business, performed during a person’s employment, or performed by or on behalf of an incorporated or unincorporated body of persons.

Facilitation Payments and Kickbacks

JacobsMassey does not make, and will not accept, facilitation payments or "kickbacks" of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official, including any employee of the NHS. While not common in the UK, JacobsMassey’s staff must be aware that these types of payments are strictly prohibited.

When making payments on JacobsMassey’s behalf, ensure the amount is appropriate for the goods or services and obtain a detailed invoice or receipt. If you have any suspicions, or concerns regarding a payment, you should raise these with a JacobsMassey manager.

Examples:

Offering a bribe

A bribe would occur if: A payment was made to influence an individual who was responsible for deciding whether JacobsMassey should be selected as the preferred bidder for the provision of services in a procurement process. If a payment was made to a 3rd party by a contractor instructed by JacobsMassey to facilitate quicker service from the 3rd party.

Receiving a bribe

A bribe would occur if: An advertising company offers a staff member an incentive to sway their choice of advertising product.

Kickbacks are payments for business favours. All workers must avoid any action that could imply offering or accepting such payments.

Individual responsibilities

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for JacobsMassey or under our control. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy. You must notify your Line Manager or the Compliance Officer as soon as possible if you believe or suspect that this policy or any other has or may be breached.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. JacobsMassey reserves its right to terminate its contractual relationship with other workers if they breach this policy.

Record-Keeping

JacobsMassey will keep financial records and have appropriate internal controls to ensure and demonstrate proper business reasons for all payments to third parties.

How to Raise a Concern

All members of the JacobsMassey team are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries, these should be raised with your Line Manager or the Compliance Officer.

Communication

Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and other third parties with whom JacobsMassey has dealings from the outset of our business relationship with them, including a requirement for compliance in all contracts.

Who is responsible for this policy?

The JacobsMassey board has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Compliance Officer has primary responsibility for implementation and interpretation of this policy across JacobsMassey. Managers are responsible for ensuring their teams understand the policy and receive regular training.

Anti-Bribery and Corruption Policy Review

This Policy will be reviewed each year. If new legislation is introduced, or changes in JacobsMassey's business require it, they will be reflected in the policy.

Policy Revised: September 2025

You can download a pdf copy of this policy from:

http://JacobsMassey.co.uk/pdf/Jacobs_Massey_Anti-Bribery_Policy.pdf