



## Anti-Bribery and Corruption Policy and Procedure

### Policy Statement

Johnston Vulcanising and Services Ltd. is committed to conducting business in an ethical and transparent manner, ensuring compliance with the Bribery Act 2010. We maintain a zero-tolerance approach to bribery and corruption in all its forms. This policy applies to all individuals working for us or on our behalf, including employees, directors, contractors, suppliers, and business partners.

### Scope

This policy covers all activities of Johnston Vulcanising and Services Ltd., including our quarrying and vulcanising activities, construction projects, sites, and offices in the UK and abroad. It applies to all employees, contractors, suppliers, and third-party agents.

### Responsibilities

- **Senior Management:** Ensure overall compliance with the Bribery Act 2010 and provide resources and support for the implementation of this policy.
- **Managers and Supervisors:** Implement and enforce this policy within their areas of responsibility, ensuring that staff and contractors are aware of and adhere to it.
- **All Employees and Contractors:** Comply with this policy, report any concerns, and participate in relevant training and awareness programs.

### Procedures

1. **Risk Assessment and Due Diligence**
  - Conduct regular risk assessments to identify areas of the business and supply chains where there is a risk of bribery and corruption.
  - Implement due diligence procedures for new and existing suppliers, contractors, and business partners to ensure they comply with anti-bribery laws and standards.
2. **Supplier Code of Conduct**
  - Develop and communicate a Supplier Code of Conduct that outlines the requirements and expectations regarding anti-bribery practices.
  - Include anti-bribery clauses in all contracts with suppliers and contractors.
3. **Training and Awareness**
  - Provide training for all employees, especially those in procurement, finance, and site management, on the risks of bribery and corruption and how to identify and report potential issues.
  - Raise awareness among staff and contractors through regular communications and updates on the importance of combating bribery and corruption.
4. **Reporting and Whistleblowing**
  - Establish a confidential reporting mechanism for employees and contractors to report concerns about bribery or corruption.



- Ensure that all reports are investigated promptly and thoroughly, with appropriate action taken where necessary.
- 5. Gifts and Hospitality**
- Establish clear guidelines on the acceptance and offering of gifts and hospitality to ensure they are reasonable, proportionate, and for legitimate business purposes.
  - Require employees to declare any gifts or hospitality received or offered, following the company's procedures.
- 6. Monitoring and Review**
- Regularly monitor and review the effectiveness of this policy and the procedures in place to combat bribery and corruption.
  - Update the policy and procedures as needed to ensure ongoing compliance with the Bribery Act 2010 and best practices.

## **Commitment**

Johnston Vulcanising and Services Ltd. is committed to upholding the highest standards of integrity and will not tolerate any form of bribery or corruption within our operations or supply chains. We expect all employees, contractors, suppliers, and business partners to share this commitment and act accordingly.

## **Contact**

For any questions or concerns about this policy, please contact Aaron Johnston by e-mail [Aaron@jvsuk.co.uk](mailto:Aaron@jvsuk.co.uk) or call 07495 376466

Signed on behalf of Johnston Vulcanising and Services Ltd.

Name: A Johnston position in the company:

C.E.O Signature: Date: 24th March 2024