



## **Anti-Bribery and Corruption Policy**

This anti-bribery policy exists to set out the responsibilities of and those who work for Forsyth of Denny Ltd/Dan McNally Ltd in regard to observing and upholding our zero-tolerance position on bribery and corruption. It also exists to act as a source of information and guidance. It helps them recognise and deal with bribery and corruption issues, as well as understand their responsibilities.

A bribe is defined as: giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for having already done so.

If you bribe (or attempt to bribe) another person, intending either to obtain or retain business for the company, or to obtain or retain an advantage in the conduct of the company's business this will be considered gross misconduct. Similarly accepting or allowing another person to accept a bribe will be considered gross misconduct. In these circumstances you will be subject to formal investigation under the Company's disciplinary procedures, and disciplinary action up to and including dismissal may be applied.

Forsyth of Denny Ltd/Dan McNally Ltd is committed to conducting business in an ethical and honest manner and is committed to implementing and enforcing systems that ensure bribery is prevented. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships and will constantly uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which we operate.

We commit to preventing bribery and corruption in our business and take our legal responsibilities seriously.

This anti-bribery policy applies to all employees (whether temporary, fixed-term, or permanent), consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, agents, sponsors, or any other person or persons associated with us (including third parties), or any of our subsidiaries or their employees ,no matter where they are located.

The Police may be notified in the event of any suspected breach of this Policy.

Wenda

Signed:

Name : Cathal McNally Hugh McNally Mark Syme

Position: Operations Manager Managing Director General Manager

Date: 01.01.2024