



Anti-bribery and Corruption Policy

The Bribery Act 2010 creates various offences, including an offence which can be committed by commercial organisations that fail to prevent persons associated with that organisation from committing bribery on their behalf. This applies regardless of whether the person works or commits the offence in the UK or any other country in which the organisation operates. However, it is a full defence for an organisation if it can prove that despite the bribery occurring, it has adequate procedures in place to prevent those persons associated with it from committing bribery. The O'Halloran & O'Brien Limited procedures must be proportionate to the bribery risks that it faces in relation to the nature, scale and complexity of the organisation.

O'Halloran & O'Brien Limited and its directors are committed to the prevention of bribery and corruption by those employed and associated with it. The organisation is committed to carrying out business fairly, honestly and openly, with zero-tolerance towards bribery and corruption.

This is achieved by:

- Carrying out a risk assessment to ascertain the risk of bribery and corruption.
- Investigating procedures proportionate to that risk.
- Having good internal controls and record-keeping
- Securing the commitment of directors, managers and all staff to the prevention and detection of bribery and corruption
- Developing a culture in which bribery and corruption are unacceptable.
- Undertaking due diligence procedures proportionate to the assessed risk of bribery and corruption.
- Effectively communicating this policy to all staff
- Training all staff to recognise bribery and corruption so that they can avoid it and be alert to possible instances of bribery or corruption.
- Having clear procedures on what to do should bribery or corruption be suspected.
- Training all staff so that they are aware of what to do should they discover a possible instance of bribery.
- Monitoring and reviewing the effectiveness of the bribery procedures and updating them as necessary to ensure that they remain effective.

This policy applies to all those employed by and associated with the organisation.

Offering bribes

A bribe is a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit.

All forms of bribery or corruption are strictly prohibited. Specifically, employees must not:

- give or offer any payment, gift, hospitality or other benefit in the expectation that a business advantage will be received in return, or to reward any business received;
- accept any offer from a third party that the employee knows, or suspect is made with the expectation that the Company will provide a business advantage for them or anyone else;
- give or offer any payment (sometimes called a facilitation payment) to a government official in any country to facilitate or speed up a routine or necessary procedure.



Bribing a public official

O'Halloran & O'Brien Limited expressly prohibits the bribing of a UK or foreign public official in order to obtain or retain business or an advantage in the conduct of business.

Relevant functions and activities

Relevant functions and activities are any function of a public nature, any activity connected with the business, any activity performed in the course of a person's employment and activity performed by or on behalf of a body of persons where the person performing that function or activity is expected to perform it impartially, in good faith, or is in a position of trust by virtue of performing it.

Hospitality and business gifts

The Bribery Act 2010 does not seek to prohibit **reasonable and proportionate** hospitality, advertising, sponsorship and promotional or other similar business expenditure, as it is recognised that this constitutes an established and important part of doing business.

However, hospitality, promotional and similar business expenditure can be used as bribes.

O'Halloran & O'Brien Limited expressly prohibits the giving and receiving of hospitality/business gifts and similar where the intention in doing so is to receive or confer an advantage in return for giving or receiving the hospitality/business gift or similar.

The following procedures should be adopted in relation to hospitality and business gifts:

- All offers of business gifts should be referred to the anti-bribery officer and should only be accepted if clearance has been received from him or her.
- Business gifts should not be made without the permission of the anti-bribery officer.
- A record of all business gifts made and received and the reason for the gift should be retained.
- All hospitality must be proportionate and reasonable and in line with the organisation's hospitality policy. Guidance should be sought from the anti-bribery officer as to whether the planned hospitality is proportionate and reasonable.
- Records should be maintained of all hospitality provided and accepted, including cost and reason for providing or accepting the hospitality.
- Quid pro quo arrangements are expressly prohibited.
- Cash gifts are expressly prohibited.
- The provision or acceptance of entertainment of a sexual nature is expressly prohibited.
- Acceptable hospitality and entertaining may include modest meals with people with whom the Company does business (such as providing a modest lunch after a meeting), or the occasional provision of or attendance at sporting or cultural events, provided that the intention is to build business relationships rather than to receive or confer an advantage.
- The provision of small promotional gifts, such as diaries, pens or similar, will generally be regarded as acceptable.
- Staff reviewing expense claims should be alert to the provision of hospitality/business gifts that may be construed as a bribe.
- All concerns should be reported.



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New business, change in business and contracts with external parties

Where employees develop or seek to develop new avenues for business or new contracts, or where the nature of the business changes, employees- should inform their line manager of this in order that due diligence and a risk assessment of the circumstances can be undertaken.

Where a business relationship with an external party is sought or newly established, or the nature of the relationship is changed, appropriate due diligence must be exercised to ensure that there are no circumstances giving rise to a concern.

That external party must also be made aware of this anti-bribery policy.

Facilitation payments

Facilitation payments are small bribes that are paid to speed up or facilitate government action. Although they are commonplace in some foreign countries, they are regarded as bribes and are illegal under The Bribery Act 2010.

The organisation expressly prohibits facilitation payments of any sort.

Any member of staff placed under pressure to make a facilitation payment should refer the matter to the anti-bribery officer immediately.

Donations

The organisation expressly prohibits the giving of donations to political parties.

Any charitable donation must be consistent with the organisation's policy on charitable giving and with the knowledge and consent of the anti-bribery officer.

The organisation expressly prohibits the making of charitable donations where the purpose of the donation is to secure an advantage.

All charitable donations must be made without expectation of reward.

Reporting concerns

All members of staff have responsibility to prevent, detect and report all instances of bribery. Staff should therefore be alert to the possibility of bribery.

Anyone who has concerns regarding acts or potential acts of bribery should speak to their line manager in the first instance.

If, for any reason, a person is not able to speak to his or her line manager, he or she should contact the anti-bribery officer.

All reports will be treated with the utmost confidentiality. However, concerns can be reported anonymously to the anti-bribery officer.

Further information about reporting concerns is available in the organisation's whistle blowing policy.



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Training and communication

All staff working for and or on behalf of O'Halloran & O'Brien Limited will receive training and instruction on the anti-bribery policy.

Staff are expected to be familiar with and understand both the policy and procedures that they need to follow in order to comply with it.

Position: Managing Director

Dated:12th May 2025.....