

O'GRADY CONSTRUCTION LTD

Company Registration No. 12973213

ANTI-BRIBERY, CORRUPTION AND COMPETITION POLICY

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Review: Annual

O'Grady Construction Ltd is committed to conducting all of its business honestly, ethically and with integrity. This policy sets out the company's approach to preventing bribery, corruption, fraud and anti-competitive behaviour, and the obligations of all personnel in upholding these standards.

1. Purpose

The purpose of this policy is to:

- ▶ State O'Grady Construction Ltd's commitment to zero tolerance of bribery, corruption, fraud and anti-competitive behaviour in all its forms
- ▶ Set out the legal framework within which the company operates
- ▶ Explain the processes in place to prevent, detect and report malpractice
- ▶ Identify the designated person to whom concerns should be reported
- ▶ Ensure all personnel understand their obligations and how to raise concerns

2. Scope

This policy applies to all directors, employees, operatives, sub-contractors, agents, consultants and any other person acting on behalf of O'Grady Construction Ltd. It applies to all business activities in every jurisdiction in which the company operates, including all relationships with clients, principal contractors, sub-contractors, suppliers and public bodies.

3. Legal Framework

O'Grady Construction Ltd ensures compliance with the following legislation:

Anti-Bribery and Corruption

- ▶ Bribery Act 2010 — it is a criminal offence to offer, promise, give, request, agree to receive or accept a bribe. The Act also creates a strict liability corporate offence of failing to prevent bribery by an associated person. O'Grady Construction Ltd reviews its procedures annually against the six principles of the Act: proportionate procedures, top-level commitment, risk assessment, due diligence, communication, and monitoring and review
- ▶ Fraud Act 2006 — the company does not engage in any form of false representation, failing to disclose information, or abuse of position for financial gain
- ▶ Proceeds of Crime Act 2002 — the company does not handle, conceal, transfer or acquire criminal property and will not facilitate money laundering in any form
- ▶ Criminal Finances Act 2017 — the company has procedures in place to prevent the facilitation of tax evasion by associated persons

Competition Law

- ▶ Competition Act 1998 — the company does not engage in agreements, concerted practices or decisions that restrict, prevent or distort competition, and does not abuse any dominant market position
- ▶ Enterprise Act 2002 — the company does not engage in bid-rigging, price-fixing or market-sharing arrangements

- ▶ Digital Markets, Competition and Consumers Act 2024 — the company observes its obligations under this legislation and ensures fair dealing with customers and competitors

4. Our Commitment — Zero Tolerance

O'Grady Construction Ltd has a zero tolerance approach to bribery, corruption, fraud and anti-competitive behaviour. The Director/s of the company are committed to implementing and enforcing effective systems to prevent these offences.

The following are strictly prohibited:

- ▶ Offering, promising or giving a bribe to any person or organisation, including public officials, clients, principal contractors, sub-contractors or suppliers
- ▶ Requesting, agreeing to receive or accepting a bribe
- ▶ Facilitating tax evasion by any person acting on behalf of the company
- ▶ Engaging in or facilitating money laundering
- ▶ Engaging in any form of fraud, false accounting or misrepresentation
- ▶ Participating in bid-rigging, price-fixing, market-sharing or any other anti-competitive arrangement
- ▶ Abusing a dominant market position

5. Gifts and Hospitality

The company recognises that the giving and receiving of gifts and hospitality is a normal part of business relationships. However, gifts and hospitality must never be used to influence a business decision or gain an improper advantage.

- ▶ Gifts of modest value (promotional items, seasonal gifts of low value) may be accepted where they are reasonable and do not create a sense of obligation
- ▶ Hospitality (meals, events) may be accepted or offered where it is proportionate, transparent and does not influence or appear to influence a business decision
- ▶ Cash or cash-equivalent gifts must never be accepted or offered in any circumstances
- ▶ Any gift or hospitality that creates doubt should be declined and reported to the Director/s
- ▶ The Director/s will maintain a gifts and hospitality register recording any item received or offered above a nominal value

6. Due Diligence and Risk Assessment

O'Grady Construction Ltd carries out proportionate due diligence on those it does business with in order to manage bribery, corruption and financial crime risk. This includes:

- ▶ Pre-qualification of sub-contractors and suppliers using OGC-F-005 / OGC-F-006 / OGC-F-007, including Companies House checks, financial stability assessment and insurance verification
- ▶ Verification of CIS registration and HMRC compliance for all sub-contractors in accordance with OGC-POL-003
- ▶ Awareness of the countries and markets in which the company and its supply chain operate, and any elevated bribery or corruption risk in those markets
- ▶ Monitoring of sub-contractor and supplier performance including any concerns arising from their conduct
- ▶ Annual review of this policy and associated procedures at Management Review (OGC-POL-001 Section 10.7.1) to assess their effectiveness against the six principles of the Bribery Act 2010

7. Reporting Concerns — Designated Contact

Any person covered by this policy who becomes aware of, or suspects, an act of bribery, corruption, fraud, money laundering, tax evasion facilitation or anti-competitive behaviour must report it immediately.

Designated contact for reporting concerns:

Damian O'Grady

Director, O'Grady Construction Ltd

30 Styal Road, Gatley, Cheadle, Cheshire SK8 4JG

Enquiry@OGrady-Construction.com | 03300 886 990

- ▶ Reports may be made in person, by telephone or by email
- ▶ Concerns may also be raised anonymously through the Whistleblowing route set out in OGC-POL-002 Section 2.5
- ▶ All reports will be investigated promptly and fairly by the Director/s
- ▶ No person will suffer any detriment, dismissal or disciplinary action for raising a genuine concern in good faith under this policy

Where an investigation reveals evidence of a criminal offence, the matter will be reported to the relevant authority — the National Crime Agency (NCA), HMRC, the Competition and Markets Authority (CMA), or the police — as appropriate.

8. Anti-Competitive Behaviour

O'Grady Construction Ltd is committed to fair competition and does not engage in any conduct that distorts or restricts competition. The following arrangements are in place to detect and avoid anti-competitive behaviour:

- ▶ All tenders are prepared independently and in confidence — tender prices are never discussed with competitors before submission
- ▶ The company does not enter into any agreement with competitors to fix prices, divide markets or coordinate bids
- ▶ Personnel are trained to recognise anti-competitive behaviour and instructed to report any approach from a competitor that suggests coordination through the reporting route at Section 7
- ▶ Sub-contractor and supplier selection is made on objective commercial criteria — quality, price, delivery, and compliance — and not on any agreement to favour particular parties
- ▶ The Director/s review the company's commercial practices annually at Management Review to confirm they remain compliant with competition law
- ▶ Where the company suspects a breach of competition law by a third party, this will be reported to the Competition and Markets Authority (CMA)

9. Training and Communication

O'Grady Construction Ltd communicates this policy to all personnel through the following channels:

- ▶ Issue of the Company Policy Manual (OGC-POL-002) to all personnel on engagement, which cross-references this policy
- ▶ The site induction programme (OGC-IND-001) which all personnel complete before commencing work on site — the induction covers the company's approach to ethical conduct, whistleblowing and reporting concerns
- ▶ The monthly toolbox talk programme, which includes anti-bribery, ethical conduct and competition awareness as standing topics in the annual schedule
- ▶ The sub-contractor pre-qualification process (OGC-F-005 / OGC-F-006) which requires supply chain partners to confirm their own compliance with anti-bribery and ethical trading requirements

10. Monitoring and Review



The Director/s of O'Grady Construction Ltd will review this policy and its effectiveness annually as part of the Management Review process (OGC-POL-001 Section 10.7.1). The review will assess the policy against the six principles of the Bribery Act 2010 (proportionate procedures, top-level commitment, risk assessment, due diligence, communication, and monitoring and review) and will consider any incidents, near misses, concerns raised, or changes in the legal or regulatory environment since the last review.

Any material changes to this policy will be communicated to all personnel promptly. The policy will be reissued at each annual review and re-signed by the Director/s.

11. Consequences of Breach

Any breach of this policy by a director, employee or operative will be treated as a serious disciplinary matter and may result in summary dismissal. Any breach by a sub-contractor, supplier or agent may result in immediate termination of the commercial relationship and removal from the Register of Approved Sub-Contractors and Suppliers. Where a breach constitutes a criminal offence, the matter will be reported to the appropriate authority.

Authorised by:

Damian O'Grady

Director, O'Grady Construction Ltd

Company Registration No. 12973213

30 Styal Road, Gatley, Cheadle, Cheshire SK8 4JG

Date: August 2026

Next Review Due: August 2027

Cross-references: OGC-POL-001 Section 10.7.1 (Management Review) | OGC-POL-002 Section 2.3 (Anti-Bribery) | OGC-POL-002 Section 2.5 (Whistleblowing) | OGC-F-005 / OGC-F-006 / OGC-F-007 (Supplier Pre-qualification) | OGC-POL-003 (Financial Stability) | OGC-IND-001 (Site Induction)