

Document: AG-POL-008
Version: REV 2
Date: 19.03.19

Anti-bribery Statement



ANTI-BRIBERY STATEMENT

This document sets out the anti-bribery policy of The Armstrong Group (Scotland) Ltd and its subsidiary operating companies (Molplant Construction Ltd, Armstrong Waste Management Ltd, Armstrong Properties (Scotland) Ltd, Armstrong Renewables (Scotland) Ltd), collectively known as 'Armstrong Group'. It covers activities undertaken by the Group throughout all office locations and operations.

On 1st July 2010 the Bribery Act 2010 came into force and applies to bribes in the UK or by a UK resident or company. This Act established three types of offence which could be committed by both individuals and by companies and a fourth which is exclusive to companies, as follows:

- Bribing another person
- Being bribed
- Bribing a foreign official
- Failure by a commercial organisation to prevent bribery
- Offences revolve around the concept of improper conduct.

What our Policy sets out to do

Our Policy seeks to satisfy the requirements of the law whilst recognising the size of our business. For the sake of clarity, the following definitions apply:

- Bribery – “offering, promising, accepting or soliciting of something which might lead to an advantage as an inducement for an illegal or unethical action or breach of trust”
- Corruption – “the abuse of entrusted power for private gain”

To whom does the Policy apply

The Policy applies to all staff, at every level and to anyone working on our behalf. Apart from upholding the law itself, The Armstrong Group believes that any infringement would have a detrimental effect on the company's reputation and business prospects. Infringement will also result in disciplinary action being taken against the employee, if proven.

Review

- An annual conformance appraisal will be carried out by the Group Managing Director
- External accountancy auditors will audit records yearly
- The Armstrong Group Directors will review this statement in June each year

Approval

This document was approved by the Board of the Armstrong Group (Scotland) Limited on **July 2019**.

Signed:

A handwritten signature in black ink, appearing to read 'Brian Winter', written over a horizontal line.

Brian Winter
Group Managing Director

Date: July 2019