

Anti Bribery Policy

1. Introduction

This Policy sets out the standards that are expected by Croudace Homes Group Limited and its subsidiary companies (“the Group”) of all its employees agents or consultants and any other person or body acting on its behalf. Further, the Group expects the same approach to doing business from suppliers and sub-contractors and any other third party dealing with the Group. When working for or with the Group, you are agreeing to and are obliged to ensure that you understand and comply with this policy.

Through its Directors, the Group takes steps to assess the risk to its business and the particular areas within it that may be particularly vulnerable. Appropriate training and procedures have been put in place on a targeted basis to prevent bribery. The anti-bribery policy will be reviewed in the light of changes in legislation or where events dictate but in any event is the subject of periodic review at Group Board level.

Third parties working for or with the Group will be expected to provide additional information or clarification where requested to ensure that the Group is satisfied as to full compliance with its policies and procedures.

2. Bribery

A bribe is defined in the Bribery Act 2010 as the receiving, offering, giving, providing, requesting or accepting of a financial or other advantage in order to:-

- Seek to induce or induce a person to give improper assistance in breach of their duty or
- Otherwise influence someone with the underlying purpose of obtaining or retaining business, or an advantage in the course of business

3. Policy

1. The Group does not, directly or indirectly offer, promise, give, solicit or accept any bribe (whether cash, excessive gifts /hospitality or other inducement) in order to obtain or retain business
2. The Group promotes employee awareness of anti-bribery policy and procedures through targeted policies and training identified and reviewed by the Directors responsible for the respective departments
3. The Group reviews its anti-bribery policy and procedures periodically at Director and Group Board level

4. The Group will investigate any instances of alleged or suspected bribery and will take any appropriate action (whether internal disciplinary action or external reporting to the relevant authorities).
5. The Group permits corporate entertainment (attended or provided by the members of the Group), gifts, hospitality and promotional expenditure that is provided, received or undertaken with a clear and legitimate business objective and:-
 - for the purpose of establishing or maintaining good business relationships; and/or
 - to improve the image and reputation of the Company; and/or
 - to present the Group's product effectively

provided always that it is reasonable, appropriate and proportionate in the circumstances. If there is any doubt about this, an individual should seek guidance from a Director or the Company Secretary, or in accordance with the Company's Whistleblowing Policy

6. In order to ensure effective monitoring the Group maintains Hospitality Registers and employees are required to apply to the relevant Director or Group Head of Department where any hospitality is in excess of an agreed level.
7. The Group does not offer or agree to make improper payments to agents, public officials, or anyone that the Group does business with
8. The Group engages and remunerates agents consultants and other third parties only for legitimate services and requires third parties to comply with appropriate due diligence checks to ensure appropriate transparency
9. The Group's internal accounting systems are designed (and externally audited on an annual basis) with suitable checks in place to prevent individuals being able to process illegitimate payments or create false records
10. The Group does not make inappropriate contributions to candidates for public office or to any political organisations.

Please note that these procedures are policy guidelines and the Company reserves the right to amend them from time to time. They are not contractual but are a term of your employment and with which you must comply