

## Anti-bribery & corruption policy ARC Building Products

ARC Building Products is committed to the highest standards of integrity and conduct and adopts a “zero tolerance” approach to bribery and corruption. This applies to both employees and anyone acting on ARC’s behalf. This policy sets out the standards expected of all ARC employees in relation to bribery and corruption by clearly stating the responsibilities upon those working for and with us. It provides guidance on how to avoid, recognise and tackle any issues.

This policy is also relevant for third parties who undertake services on our behalf. ARC Building Products expect those third parties to abide by this policy or have equivalent policies in place that combat bribery and corruption. ARC Building Products take its responsibilities seriously due to the significant risks that non-compliance brings should employees or service providers fail to comply.

### **Bribery**

A bribe is any financial or other type of advantage offered, promised or given from one person to another in order to gain commercial, contractual, regulatory or personal advantage. Bribes are not just monetary, they can be any type of gift, hospitality or inducement. A contract or transaction does not need to happen or be completed for bribery to have taken place. To comply with this policy:

- Do not offer promise or pay/provide bribes
- Do not accept, request or agree to bribes

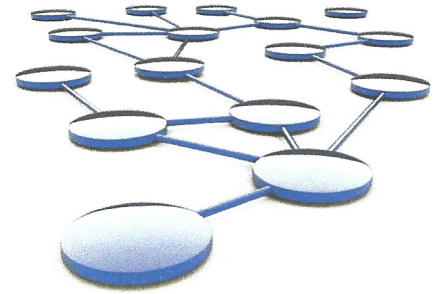
### **Gifts, hospitality & entertainment**

This policy does not prohibit normal and appropriate gifts, entertainment and hospitality, both received and given, from and to third parties. Routine and inexpensive activities such as business breakfasts/lunches and small items of promotional material such as ARC Building Products branded marketing items remain appropriate to what we do. However, any other type of gifts, hospitality or entertainment is subject to the following rules:

- they are appropriate to the circumstances and there is no risk that they could be perceived as improperly influencing the recipient
- they are for the purpose of establishing or maintaining good and ethical business relationships
- they improve the image or reputation of the ARC Building Products and is arranged in good faith
- any gifts hospitality or entertainment is not offered promised or accepted to secure an advantage for the company or any of its employees, or to influence the impartiality of the recipient

ARC Building Products has procedures for accepting or providing gifts, hospitality or entertainment. In general, this should be with the full and open knowledge of your manager and, where possible, in advance. The expenses system should be used to record any such spending or arrangements. If you answer yes to any of the following questions about any exchanges, you must discuss the issue with your manager:

1. Is it intended to influence a third party, gain or retain advantage
2. Is the gift/hospitality in your individual name rather than the ARC Building Products name
3. Is any part of it cash or cash equivalent
4. Is any part of the transaction secretive
5. Is it in breach of any local law



Report to your manager any suspected or actual bribery, or any concerns that other employees or associated persons may be linked with bribery. ARC Building Products will investigate any allegations or suspected bribery, this includes use of the disciplinary processes and referral of information/investigations to relevant enforcing authorities.

#### **Facilitation payments**

These are typically small unofficial payments made to secure or expedite a routine government action by a government official. ARC Building Products does not and will not accept or make facilitation payments of any kind. Our intermediaries or agents acting on our behalf must not breach this position.

#### **Intermediaries, suppliers, agents and service providers**

Employees of the ARC Building Products exercise due diligence to prevent bribes being offered or given by intermediaries, suppliers, agents or service providers. Third parties are expected to abide to a similar zero tolerance approach to bribery and corruption. Agreements entered into should provide for their termination in the event of actual or perceived corruption or bribery by the third party with any concerns immediately being raised with management.

#### **Conflicts of interest**

This is a situation in which personal interest of an employee or representative conflicts with the interests of the business. It can be financial, professional, family or other interests. Please report any such conflicts, or perceived possible conflicts, to your manager so they can support you in managing the situation.

#### **Responsibilities**

Employees of ARC Building Products must read, understand and comply with this policy. Employees follow procedures (including procurement, and financial procedures) to minimise the risk of actual or perceived bribery or corruption by employees or third parties.

ARC Building Products employees will notify management of any concerns regarding compliance with this policy. Those persons will be investigated in a manner that reflects ARC Building Products zero tolerance position to bribery and corruption. No persons raising such concerns will be subject to unfavourable treatment or disciplinary action.

Expenses claims relating to hospitality, gifts or expenses incurred to third parties must be submitted in accordance with expenses policies along with reasons for the expenses being incurred. Such expenses must not be concealed.

ARC Building Products management has overall responsibility for reviewing and approving this policy.



**Martin Nolan**



**David Orr**



**Fergal Simpson**