



## Cork Scaffolding Anti-Bribery Policy

### 1. Purpose

Cork Scaffolding is committed to conducting its business in an honest and ethical manner. We have a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly, and with integrity in all our business dealings and relationships. This policy outlines our responsibilities and the standards of behaviour we expect from all employees and business partners.

### 2. Scope

This policy applies to:

- All employees, including full-time, part-time, temporary, and contract staff
- Directors and officers
- Subcontractors, agents, consultants, and other third parties acting on our behalf

### 3. Definition of Bribery

Bribery refers to offering, promising, giving, accepting, or soliciting something of value (such as gifts, money, favours, or hospitality) to influence a decision or gain an improper business advantage. It includes but is not limited to:

- Giving or receiving kickbacks
- Offering excessive hospitality to secure contracts
- Making facilitation payments to expedite routine services

### 4. Prohibited Conduct

It is prohibited for any employee or third-party representing Cork Scaffolding to:

- Offer or accept bribes in any form
- Make or receive facilitation payments
- Give gifts or hospitality with the intention of influencing a business outcome
- Engage in any conduct that could be perceived as corrupt or improper

### 5. Gifts and Hospitality

Modest and appropriate gifts or hospitality may be allowed if:

- They are infrequent and of low value
- They are given openly and transparently
- They are not intended to secure an improper advantage

All gifts and hospitality must be recorded and approved by a manager.

## **6. Responsibilities**

All employees and representatives must:

- Read, understand, and comply with this policy
- Report any suspicions of bribery or corruption
- Avoid conflicts of interest or situations that could appear improper

Managers are responsible for ensuring staff are aware of and follow this policy.

## **7. Reporting Concerns**

Any concerns regarding suspected bribery or corruption should be reported immediately to:

- Your line manager
- A designated compliance officer
- An anonymous reporting mechanism if available

Reports will be treated confidentially and investigated promptly.

## **8. Consequences of Breach**

Violations of this policy may lead to:

- Disciplinary action, including dismissal
- Termination of contracts with subcontractors or suppliers
- Legal consequences, including prosecution under the **Criminal Justice (Corruption Offences) Act 2018** and other applicable Irish laws

## **9. Review and Training**

This policy will be reviewed annually and updated as necessary. All staff will receive training to ensure understanding and compliance with anti-bribery obligations.