The Martin Group of Companies

Incorporating:

HW Martin Holdings Ltd

HW Martin Fencing and Forestry Limited

HW Martin Traffic Management Limited

HW Martin Safety Fencing Limited

HW Martin Fleet Maintenance Ltd

HW Martin Waste Ltd

Amber Langis

Premier Waste Recycling Limited

Lochrin Bain Limited

King Vehicle Engineering Limited

King Trailers Limited

King Transport Equipment Limited

King Highway Products Limited

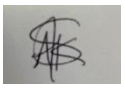
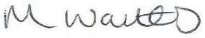
Safety Vehicle Hire and Lease Limited

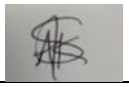
Virtus Traffic Management Solutions Limited

Fewzed Limited

Group Anti-Bribery and Corruption Policy

Document History

Written by	Anna-Kay Shaw	
Authorised by	Marie Walters	

Review Date	Reviewed By		Comments / Amendments	Version
29 September 2025	Aidan Lack		Addition into the companies incorporated within the Martin Group of Companies.	2.1
25 June 2025	Anna-Kay Shaw		Annual review. Change to naming convention to show policy is controlled by finance.	2.0
28-June 2024	Jim Clegg		Annual review. No significant changes.	1.5
26 February 2024	Gavin Peace		Interim review to reflect authorization name change.	1.4
30 April 2023	Gavin Peace		Annual Review. Virtus Traffic Management Solutions Limited added. Anti-Bribery Policy statement and Bribery Act offences updated.	1.3
30 April 2022	Iain Kay		Annual review. No changes.	1.2
30 April 2021	Iain Kay		Annual review. No content changes. New logo added.	1.1
30 April 2020	Iain Kay		Annual review and change to document reference in line with MSV 03-1-3 Procedure for Documented Information	1.0

The Martin Group of Companies is committed to conducting its business legally, fairly, honestly, and with integrity and probity. This is essential if we are to build and retain effective relationships with our customers, employees, partners, suppliers, and the wider community. Our long-term success and growth depend upon this.

Policy Statement - Anti Bribery

Bribery is a criminal offence. We do not, and will not, pay bribes or offer improper inducements to anyone for any purpose, nor do we or will we, accept bribes or improper inducements. To use a third party as a conduit to channel bribes to others is a criminal offence. We do not, and will not, engage indirectly in or otherwise encourage bribery.

We are committed to the prevention, deterrence and detection of bribery. We have a zero tolerance towards bribery. We aim to maintain anti-bribery compliance "business as usual", rather than as a one-off exercise.

All employees are required to conduct themselves in a professional manner. They will act considerately, responsibly, decently and with due regard to the dignity and rights of others in both business and personal dealings.

In particular we will:

- Develop a culture where responsible and ethical behaviour is seen as an essential and integral part of our day-to-day activity
- Maintain and demand high professional standards, honour our commitments, and act consistently with integrity, care and diligence
- Communicate in an open and honest manner, while fully recognising the confidentiality and sensitivity of some information in our possession
- Build and protect the trust and confidence of all those who work with us, by listening to and respecting their reasonable convictions and interests
- Demand honesty and require everyone to avoid conflicts of interest and, where they do occur, to openly declare them
- Encourage all employees to report any activity which seems to them to be in breach of this policy. Any person so reporting can do so without fear of reprisal providing that the report has been made in good faith and not made with the aim of personal gain
- Ensure that our business activities are conducted in such a way as not to adversely affect the environment

The Company explicitly prohibits the use of "blacklisting" in the selection of potential personnel.

The Bribery Act

There are four key offences under the Act:

• bribery of another person

• accepting a bribe

• bribing a foreign official

• failing to prevent bribery

The Bribery Act 2010 makes it an offence to offer, promise or give a bribe. It also makes it an offence to request, agree to receive, or accept a bribe.

An organisation will have a defence to this corporate offence if it can show that it had in place adequate procedures designed to prevent bribery by or of persons associated with the organisation.

A bribe is described as the provision of a financial or other advantage in connection with a person performing a function "improperly".

Failure of commercial organisations to prevent bribery

Under section seven of the Act, an organisation will be liable if a person associated with it bribes another person with the intention of obtaining or retaining business or gaining an advantage in the conduct of business for the organisation.

There is also a corporate offence of failure by a commercial organisation to prevent bribery that is intended to obtain or retain business, or an advantage in the conduct of business, for the organisation.

An associated person could be an employee, agent, contractor, sub-contractor, or supplier acting on behalf of the organisation.

Penalties

The penalties for breaching the provisions of the Act are severe, with convictions carrying unlimited fines for businesses, and up to 10 years' imprisonment and unlimited fines for individuals.

The Group and its Directors are committed to the prevention of bribery by those employed and associated with it. The Group is committed to carrying out business fairly, honestly and openly, with zero-tolerance towards bribery.

Offering bribes

The Group expressly prohibits any person employed by or associated with it from offering, promising or giving any financial or other advantage to another person where it is intended that the advantage will bring about improper performance by another person of a relevant function or activity, or that the advantage will reward such improper performance.

The Group prohibits any person employed by or associated with it from offering, promising or giving any financial or other advantage to another person where it is believed that the acceptance of the advantage offered, promised or given in itself constitutes the improper performance of a relevant function or activity.

Accepting bribes

The Group expressly prohibits any person employed by or associated with it from requesting, agreeing to receive or receiving any financial or other advantage with the intention that a relevant function should be performed improperly as a result of the advantage or as a reward for performing the relevant function improperly.

The improper performance of a relevant function in anticipation of receiving financial or other advantage is also prohibited.

Bribing a public official

The Group expressly prohibits the bribing of a UK or foreign public official in order to obtain or retain business or an advantage in the conduct of business.

Relevant functions and activities

Relevant functions and activities are any function of a public nature, any activity connected with the business, any activity performed in the course of a person's employment and activity performed by or on behalf of a body of persons where the person performing that function or activity is expected to perform it impartially, in good faith, or is in a position of trust by virtue of performing it.

Hospitality and business gifts

The Act does not seek to prohibit reasonable and proportionate hospitality, advertising, sponsorship and promotional or other similar business expenditure, as it is recognised that this constitutes an established and important part of doing business. However, hospitality, promotional and similar business expenditure may be used as bribes. The following procedure should be adopted in relation to hospitality and business gifts.

1. A record of all business gifts made and received and the reason for the gift should be retained.
2. All hospitality must be proportionate, reasonable and in line with the organisation's hospitality policy. Guidance should be sought from the anti-bribery officer as to whether the planned hospitality is proportionate and reasonable.
3. Records should be maintained of all hospitality provided and accepted, including cost and reason for providing or accepting the hospitality.
4. Cash gifts are expressly prohibited.
5. The provision or acceptance of entertainment of a sexual nature is expressly prohibited.
6. Acceptable hospitality and entertaining may include modest meals with people with whom we do business (such as providing lunch after a meeting) or the occasional provision of or attendance at sporting or cultural events, provided that the intention is to build business relationships rather than to receive or confer an advantage.
7. The provision of small promotional gifts, such as diaries, pens or similar will generally be regarded as acceptable.
8. Staff reviewing expense claims should be alert to the provision of hospitality or business gifts that may be construed as a bribe.
9. All concerns should be reported.

New business and contracts with external parties

Where employees develop or seek to develop new avenues for business or new contracts, or where the nature of the business changes, you should inform your line manager of this in order that due diligence and a risk assessment of the circumstances can be undertaken.

Where a business relationship with an external party is sought or newly established, or the nature of the relationship is changed, appropriate due diligence must be exercised to ensure that there are no circumstances giving rise to a concern. That external party must also be made aware of this anti-bribery policy.

Facilitation payments

Facilitation payments are small bribes that are paid to speed up or facilitate government action. Although they are commonplace in some foreign countries, they are regarded as bribes and are illegal under the Act. The Group expressly prohibits facilitation payments of any kind.

Any member of staff placed under pressure to make a facilitation payment should refer the matter to their line manager immediately. Anyone who has concerns regarding acts or potential acts of bribery should speak to their line manager in the first instance. If for any reason a person is not able to speak to their line manager, they should contact an appropriate Senior Manager or a Director.

Donations

The Group expressly prohibits the giving of donations to political parties and the making of charitable donations where the purpose of the donation is to secure an advantage. All charitable donations must be made without expectation of reward.

Reporting concerns

All members of staff have a responsibility to prevent, detect and report all instances of bribery. Staff should remain vigilant and be alert to the possibility of bribery. Further information about reporting concerns is available in the Group's Whistle Blowing policy.

Training and communication

All staff will be briefed on this policy to ensure that they understand its content and the procedures to be followed for compliance. Employees should familiarise themselves with this policy to ensure they understand their obligations and responsibilities in relation to it. Any questions should be directed to an appropriate senior manager in the first instance.

Changes to this policy and any associated procedures will be communicated to staff in an appropriate manner and usually in writing.

Sanctions

The Group treats breaches of this policy with maximum seriousness and will investigate any potential breach in accordance with the disciplinary policy. The ultimate sanction for a breach of the policy will be summary dismissal for gross misconduct.

M Walters

Marie Walters
Chief Finance Officer