ANTI-BRIBERY & CORRUPTION POLICY
(incorporating Gifts & Hospitality)
Date of Publication: 1st May 2026

PURPOSE

The purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery and corruption regulations, and to ensure that the Company's business is conducted in a socially responsible manner.

POLICY STATEMENT

Bribery is the offering, promising, giving, accepting, or soliciting of an advantage as an inducement for action which is illegal or a breach of trust. A bribe is an inducement or reward offered, promised, or provided in order to gain any commercial, contractual, regulatory, or personal advantage.

Styles Façade Solutions (the trading name of Heritage Building Conservation Ltd or "the Company") is committed to the highest standards of ethical conduct and integrity in all its business activities. This policy outlines the Company's position on preventing and prohibiting bribery, in accordance with the Bribery Act 2010. The Company will not tolerate any form of bribery by, or of, its employees, agents or consultants or any person or body acting on its behalf.

The Senior Management are committed to implementing effective measures to prevent, monitor and eliminate bribery. The Bribery Act 2010 came into force from 1 July 2011.
This policy covers:

- the main areas of liability under the Bribery Act 2010.
- the responsibilities of employees and associated persons acting for, or on behalf of, the Company; and
- the consequences of any breaches of this policy.

BRIBERY ACT 2010

The Company is committed to complying with the Bribery Act 2010 in all its business activities. Under the Bribery Act 2010, a bribe is a financial or other type of inducement that is offered or requested with the:

- intention of rewarding improper performance of a function or activity; or
- knowledge or belief that accepting such a reward would constitute the improper
- performance of such a function or activity.

A relevant function or activity includes public, state or business activities or any activity performed in the course of a person's employment, or on behalf of another company or individual, where the person performing that activity is expected to perform it in good faith, impartially, or in accordance with a position of trust.

A criminal offence will be committed under the Bribery Act 2010 if:

- an employee or associated person acting for, or on behalf of, the Company offers, promises, gives, requests, receives or agrees to receive bribes; or
- an employee or associated person acting for, or on behalf of, the Company offers, promises, or gives a bribe to a foreign public official with the intention of influencing that official in the performance of his/her duties (where local law does not permit or require such influence); and
- the Company does not have the defence that it has adequate procedures in place to prevent bribery by its employees or associated persons.

All employees and associated persons are required to comply with this policy, in accordance with the Bribery Act 2010.

WHAT IS PROHIBITED?

The Company prohibits employees or associated persons from offering, promising, giving, soliciting, or accepting any bribe. The bribe might be cash, a gift or other inducement to, or from, any person or company, whether a public or government official, official of a state-controlled industry, political party or a private person or company, regardless of whether the employee or associated person is situated in the UK or overseas.

The bribe might be made to ensure that a person or company improperly performs their duties or functions (for example, by not acting impartially or in good faith or in accordance with their position of trust) to gain any commercial, contractual or regulatory advantage for the Company in either obtaining or maintaining Company business, or to gain any personal advantage, financial or otherwise, for the individual or anyone connected with the individual.

This prohibition also applies to indirect contributions, payments or gifts made in any manner as an inducement or reward for improper performance, for example through consultants, contractors or subcontractors, agents or sub-agents, sponsors or sub-sponsors, joint venture, partners, advisors, customers, suppliers or other third parties.

RECORDS

Employees and, where applicable, associated persons, are required to take particular care to ensure that all company records are accurately maintained in relation to any tender contract or business activity, including financial invoicing and all payment transactions with clients, suppliers, and public officials.

Due diligence should be undertaken by employees and associated persons prior to entering any contract, arrangement, or relationship with a potential supplier of services, agent, consultant or representative.

Employees and associated persons are required to keep accurate, detailed, and up-to-date records of all corporate hospitality, entertainment or gifts accepted or offered.

CORPORATE ENTERTAINMENT, GIFTS, HOSPITALITY, AND PROMOTIONAL EXPENDITURE

The Company permits corporate entertainment, gifts, hospitality, and promotional expenditure that is undertaken:

- for the purpose of establishing or maintaining good business relationships.
- to improve the image and reputation of the Company; or
- to present the Company's services effectively; provided that it is arranged in good faith, and
- not offered, promised, or accepted to secure an advantage for the Company or any of its employees or associated persons or to influence the impartiality of the recipient.

The Company will authorise only reasonable, appropriate, and proportionate entertainment and promotional expenditure. This principle applies to employees and associated persons, whether based in the UK or overseas.

Employees and, where relevant, associated persons should submit requests for proposed hospitality and promotional expenditure well in advance of proposed dates to The Managing Director.

Employees are required to set out in writing:

- the objective of the proposed client entertainment or expenditure
- the identity of those who will be attending.
- the organisation that they represent, and details and rationale of the proposed activity.

The Company will approve business entertainment proposals only if they demonstrate a clear business objective and are appropriate for the nature of the business relationship. The Company will not approve business entertainment where it considers that a conflict of interest may arise or where it could be perceived that undue influence or a particular business benefit was being sought (for example, prior to a tendering exercise).

Any gifts, rewards or entertainment received or offered from clients, public officials, suppliers, or other business contacts should be reported immediately to the Managing Director. In certain circumstances, it may not be appropriate to retain such gifts or be provided with the entertainment, and employees and associated persons may be asked to return the gifts to the sender or refuse the entertainment, for example, where there could be a real or perceived conflict of interest. As a general rule, small tokens of appreciation, such as flowers or a bottle of wine, may be retained by employees.

If an employee or associated person wishes to provide gifts to suppliers, clients or other business contacts, prior written approval from The Managing Director is required, together with details of the intended recipients, reasons for the gift and business objective. These will be authorised only in limited circumstances.

Employees and, where applicable, associated persons must supply records and receipts, in accordance with the Company's expenses policy.

GIFTS AND HOSPITALITIES

The Company permits the offering and acceptance of gifts and hospitality only where this is done transparently, in good faith, and for a legitimate business purpose, and where it complies fully with the Bribery Act 2010. All gifts and hospitality must be reasonable, proportionate, infrequent, and must not influence, or be perceived as influencing, business decisions or creating any obligation or conflict of interest.

Cash or cash-equivalent gifts, lavish or excessive hospitality, and any gifts or hospitality connected to tendering, procurement, or decision-making processes are strictly prohibited. Gifts or hospitality intended to secure an improper advantage, or offered to public officials without prior written approval, are not permitted.

All gifts and hospitality offered or received must be declared to the Managing Director, recorded appropriately, and approved in advance where required.

Failure to comply with this policy may result in disciplinary action, including dismissal, and could expose both the individual and the Company to criminal liability.

CONFLICTS OF INTEREST

The Company requires all business decisions to be made objectively, fairly, and in the best interests of the Company. Employees and persons acting on behalf of the Company must avoid any situation where personal, financial, or other interests could conflict, or be perceived to conflict, with their professional duties.

Conflicts of interest may be actual, potential, or perceived and can arise through personal relationships, financial interests, outside employment, misuse of Company information or resources, or the acceptance of gifts or hospitality that does not comply with the Gifts and Hospitalities Policy.

All actual or potential conflicts of interest must be disclosed promptly to the Managing Director and updated if circumstances change. Declaring a conflict does not imply wrongdoing; transparency allows the Company to manage conflicts appropriately and protect both the individual and the business.

Failure to disclose or appropriately manage a conflict of interest may result in disciplinary action, including dismissal, and may constitute gross misconduct in serious cases.

CHARITABLE AND POLITICAL DONATIONS

The Company considers that charitable giving can form part of its wider commitment and responsibility to the community. The Company may support fundraising events involving employees.

This policy does not prohibit:

- normal and appropriate hospitality and entertainment with clients

- the use of any recognised fast-track process that is publicly available on payment of a fee.
- Any such practices must be proportionate, reasonable, and made in good faith.

Clear records must be kept.

REPORTING SUSPECTED BRIBERY

The Company depends on its employees and associated persons to ensure that the highest standards of ethical conduct are maintained in all its business dealings. Employees and associated persons are requested to assist the Company and to remain vigilant in preventing, detecting, and reporting bribery.

Employees and associated persons are encouraged to report any concerns that they may have to The Managing Director as soon as possible. Issues that should be reported include:

- any suspected or actual attempts at bribery.
- concerns that other employees or associated persons may be being bribed; or
- concerns that other employees or associated persons may be bribing third parties, such as clients or government officials.

Any reports will be thoroughly and promptly investigated by The Managing Director in the strictest confidence. Employees and associated persons will be required to assist in any investigation into possible or suspected bribery.

Employees will also be required to comply with the Company's whistleblowing policy.

Employees or associated persons who report instances of bribery in good faith will be supported by the Company. The Company will ensure that the individual is not subjected to detrimental treatment as a consequence of his/her report. Any instances of detrimental treatment by a fellow employee because an employee has made a report will be treated as a disciplinary offence. An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority, employees and associated persons should not agree to remain silent. They should report the matter to the Managing Director or, if not appropriate, the People and Culture Manager.

ACTION BY THE COMPANY

The Company will fully investigate any instances of alleged or suspected bribery. Employees suspected of bribery may be suspended from their duties while the investigation is being carried out. The Company will invoke its disciplinary procedures where any employee is suspected of bribery, and proven allegations may result in a finding of gross misconduct and immediate dismissal. The Company may terminate the contracts of any associated persons, including consultants or other workers who act for, or on behalf of, the Company who are found to have breached this policy.

The Company may also report any matter to the relevant authorities, including the

Director of Public Prosecutions, Serious Fraud Office, Revenue and Customs Prosecutions Office and the police. The Company will provide all necessary assistance to the relevant authorities in any subsequent prosecution.

REVIEW OF PROCEDURES AND TRAINING

The Company will regularly communicate its anti-bribery measures to employees and associated persons. The Company will set up training sessions where applicable. The Managing Director is responsible for the implementation of this policy.

The accounts department will monitor and review the implementation of this policy and related procedures on a regular basis, including reviews of internal financial systems, expenses, corporate hospitality, gifts, and entertainment policies.

Employees and those working for, or on behalf of, the Company are encouraged to contact the Managing Director with any suggestions, comments, or feedback that they may have on how these procedures may be improved.

The Company reserves the right to amend and update this policy as required. For the avoidance of doubt, this policy does not form part of employees' contracts of employment.

For Styles Façade Solutions (the trading name of Heritage Building Conservation Ltd)

Mr. M Styles
Managing Director
1st May 2026