



AARSLEFF

ANTI-BRIBERY AND CORRUPTION POLICY

Aarsleff Ground Engineering Ltd expects its employees to demonstrate honesty, integrity and fairness in all aspects of their duties carried out on behalf of the Company. Similarly, relationships with all stakeholders including clients and suppliers will be at all times conducted professionally and to high ethical standards.

The Company will not tolerate bribery or corruption in any form and has a 'zero tolerance' approach to any breach of this policy. Any such breach will be treated as gross misconduct.

1. The Company does not, directly, or indirectly, offer, promise, give, accept or demand a bribe or other benefit, including hospitality, gifts, loans, rewards or inducements either cash or otherwise, in order to gain a business advantage or for personal gain.
2. The Company does not offer, nor exceed, to make illicit or illegal payments.
3. The Company does not offer or make any political or charitable donations directly or indirectly linked to receiving any business advantage. Any such donations made in good faith will be publically disclosed.
4. All business relationships with our stakeholders will be on a transparent basis.
5. The Company will promote awareness and compliance by all Company employees of this policy and ensure that management procedures are in place to enforce this policy.
6. Any reports or suspicion of bribery or corruption will be thoroughly investigated in accordance with company disciplinary procedures.

The contents of this policy and all revisions which may be made will be brought to the notice of all employees.

This policy will form part of the Integrated Management System and be formally reviewed annually by Senior Management.

Signed.....
Kevin Hague - Managing Director

Date..... JAN 22.....