

FORTA PREFAB Anti-Bribery and Corruption Policy

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1. Introduction

Everyone working for the FORTA PREFAB is expected to deal with the authority, schools, service suppliers, contractors, colleagues and the public with the highest degree of integrity. This will be achieved by adopting responsible business practices and operating ethically in our undertakings.

This policy applies to all employees including individuals seconded from a parent company organisation, consultants, agency staff, temporary workers and any other third parties working on FORTA PREFAB premises, undertakings or on behalf of FORTA PREFAB.

1.1. General Principles

As an employee you should conduct yourself with integrity, impartiality and honesty. You must not use your authority or position for personal gain or against the FORTA PREFAB's interest.

In particular, you should:

- Handle internal and external business with complete integrity without reference to personal interest.
- Inform your manager in writing, copied to the FORTA PREFAB Managing Director if you have any personal interest that might affect, or could be seen by others to affect, your impartiality in dealing with suppliers, contractors or members of the public or in discharging the responsibilities of the role.
- Ensure orders and contracts are awarded on merit, in fair competition against other tenders, when required and that no special favour in the tendering process is shown.

- Maintain the standards of professional competence relevant to your role, exercise a proper level of control to prevent shortfalls, and support others to do likewise.
- Reject any business practice which might reasonably be deemed improper.
- Follow the letter and the spirit of the law, guidance from appropriate professional institutions or bodies, good business practice and contractual obligations.
- Comply with all financial agreements you have entered into with the organisation.
- Not deceive or knowingly mislead contractors, suppliers, the public, the Board or colleagues.
- Deal with all colleagues and external bodies sympathetically, efficiently, promptly and without bias.
- Inform your line manager at the earliest opportunity if you believe that any part of this policy has been breached.

2. Confidentiality and Disclosure of Information

You should not disclose information about the FORTA PREFAB, other than that required by the normal course of your work or which is already in the public domain, unless expressly authorised to do so, in writing, by your line manager.

You must not use any confidential information, whether technical, commercial, financial, personnel or other for personal gain or against the FORTA PREFAB's interests or pass it on to others who might use it in this way. All information you provide must be true, fair and not intended to mislead.

It is essential to create an open and accountable environment in which we all feel able to raise concerns internally without fear of disciplinary or any other action being taken as a result of any disclosure and be assured that a fair investigation will take place.

No employee may be dismissed or penalised as a result of publicly disclosing serious concerns. If you discover information believed to show malpractice or wrongdoing, this should be disclosed without fear of reprisal.

3. Lectures, Broadcasts and Publications

You are encouraged to contribute to, or participate in, external discussions or publications to increase your professional or technical knowledge. When doing so, you must not make statements which are not yet public knowledge, express views in any way which might suggest they are official policy, or refer to possible or actual decisions in a manner likely to cause misunderstanding or bring the organisation into disrepute.

Further standards appropriate to specific types of work may apply. Please refer to any procedures within your department for more information.

If you are meeting with a stakeholder or any third party that could have influence upon how the FORTA PREFAB is perceived, or may be speaking at any event where stakeholders may be present you should inform the FORTA PREFAB Managing Director who will then be able to advise and help you if necessary, with appropriate briefing material.

4. Contact with the Media

It is FORTA PREFAB's policy that any contact with the media is to be carried out by nominated spokespersons or individuals from respective Corporate Affairs teams. In the event that journalists or other media representative contacts you then please direct them to the FORTA PREFAB Managing Director.

5. Records and Instructions

You have a responsibility to ensure that any records and accounts for which you are responsible are truthful, accurate, complete, up to date, compliant with legal and any other relevant regulations and standing orders and that they are suitable to be a proper basis for informed management decisions.

You must observe all accounting and other relevant instructions when dealing with money, credit cards, etc., or handling items of potential value.

5.1. Principles

It is FORTA PREFAB's policy that you:

- Only accept business gifts of very small intrinsic value, such as business diaries or calendars.
- Decline hospitality which might reasonably be seen by others as capable of having influenced a business decision.
- Record and report any business gifts/offers of hospitality offered and accepted or declined. This will be maintained by the FORTA PREFAB Managing Director.

5.2. Hospitality

You should not allow yourself to be in a position whereby you might reasonably be seen by others to have been influenced in making a business decision as a consequence of accepting hospitality. You can accept modest business meals from work contacts and in these situations you should advise your line manager in writing. Invitations to hospitality events involving organised entertainment, sporting events, etc. can be accepted on authority from your Director or the FORTA PREFAB Managing Director. Lunches, dinners and professional functions do not require prior authorisation, but you should decline hospitality which includes an overnight stay in a hotel.

Please pay particular attention to the circumstances in which hospitality is offered. For example, you are required to decline any offers of hospitality by an individual or organisation during a bidding/tendering process or where a contract is shortly to end or where performance of the contract is in question or in any other circumstances where acceptance might compromise your position within the organisation. All travel expenses must be borne by FORTA PREFAB for any visits to suppliers as part of a tender assessment exercise or visits to suppliers already engaged.

5.3. Business Gifts

If you receive a business gift of any kind from an existing or potential business contact, you must disclose the fact of the gift, its nature and the identity of the sender to your line manager. You can accept the gift if your line manager agrees it is modest and genuinely given as a token of appreciation or gratitude. You will need to declare the gift in writing to your line manager using the relevant form and make sure you do not subsequently treat the person who sent the gift more favourably than other customers/suppliers, etc. If your line manager thinks that the gift is

excessively generous or might reasonably be seen by others as a bribe or other inducement, you will be asked to pass the gift to FORTA PREFAB Managing Director who will return it to the sender with a suitable letter explaining the Company's policy and asking that it be respected in the future.

5.4. Declaration of Business Gifts and Hospitality

Employees must declare all business gifts and hospitality **whether accepted or not** to their line manager via the record form which can be found on the FORTA PREFAB server.

5.5. Exclusions

This policy does not apply to promotional gifts, i.e. items such as stationery or pens that bear the logo or company name of another organisation, provided that these have no significant value. If you are unsure whether to accept gifts or hospitality you are advised to decline them. In all cases hospitality given must be in order to build and develop relationships to the benefit of FORTA PREFAB and should not be for the primary benefit of individual employees.

Mārtiņš Motivāns
CEO
FORTA PREFAB

