

FRAUD & ANTI-BRIBERY, COMPETITION AND ECONONMIC POLICY

1. Purpose

Cheetham Hill Construction Limited (CHC) is committed to conducting its business with the utmost integrity and in accordance with applicable UK legislation, including the Fraud Act 2006, the UK Bribery Act 2010 and UK competition law.

This policy sets out CHC's approach to preventing, detecting and responding to fraud, bribery, anti-competitive behaviour and other forms of economic crime.

CHC is committed to conducting its activities fairly and transparently and will not engage in, encourage or facilitate conduct that unlawfully restricts competition.

2. Scope

This policy applies to all CHC directors, employees, agency staff, consultants, suppliers, subcontractors and any other persons acting on behalf of the Company.

All persons within the scope of this policy are expected to comply with applicable legislation and CHC's procedures and controls.

3. Core Principles

CHC expects all employees and business partners to respect and uphold its core values of trust, honesty, integrity and fair dealing.

CHC has zero tolerance for fraud, bribery, corruption and unlawful anti-competitive behaviour.

CHC does not tolerate the offering, giving, requesting, receiving or acceptance of bribes in any form.

A bribe is any financial payment or other reward intended to induce or influence someone to act improperly, including facilitation payments, kickbacks or other improper favours.

Payments or rewards intended to influence foreign public officials are strictly prohibited.

Hospitality that is proportionate, for legitimate business purposes and not intended to influence improper performance is not considered a bribe.

CHC will conduct its commercial activities independently and fairly and expects employees and business partners to avoid conduct that could unlawfully distort competition.

4. Fraud

Fraud is defined in line with the Fraud Act 2006 and includes, but is not limited to:

- Theft or misappropriation of CHC or client assets.
- False accounting or misrepresentation.
- Collusion with suppliers or third parties.
- Dishonest claims or invoices.

- Abuse of position for personal gain.
- Deliberate manipulation or falsification of commercial or financial information.

Any suspected fraudulent activity must be reported in accordance with the reporting procedures in this policy

5. Competition Law Compliance

CHC is committed to complying with applicable UK competition law, including the Competition Act 1998, the Enterprise Act 2002 and the Digital Markets, Competition and Consumers Act 2024, together with any other applicable competition legislation and regulatory requirements.

CHC will not enter into, encourage or facilitate agreements, arrangements or conduct that unlawfully restricts or distorts competition.

Employees and persons acting on behalf of CHC must not participate in anti-competitive arrangements or exchange commercially sensitive information with competitors.

Prohibited conduct includes, but is not limited to:

- Agreeing or coordinating prices, discounts, fees, margins or other commercial terms with competitors.
- Bid rigging, cover pricing or coordinating tender submissions.
- Allocating customers, contracts, markets or territories between competitors.
- Agreeing to restrict or control the supply of goods or services.
- Exchanging commercially sensitive information with competitors, including information relating to current or future prices, costs, margins, tender strategies, customers, business plans or market strategy.
- Entering into other arrangements with competitors that have the purpose or effect of unlawfully restricting competition.
- Abusing a dominant market position where applicable.
- Using industry meetings, trade associations or other business contacts as an opportunity to engage in anti-competitive discussions.

Employees must immediately leave any meeting or discussion where inappropriate competition-sensitive information is being exchanged and report the concern to a director or designated compliance contact.

Where there is uncertainty about whether a proposed commercial arrangement, discussion or exchange of information could raise competition-law concerns, employees must seek guidance from management before proceeding.

6. Responsibilities

Directors and Board

The Directors and Board are responsible for promoting ethical behaviour, ensuring appropriate fraud, bribery and competition-law controls are maintained, and reviewing this policy annually.

Management

Management is responsible for identifying fraud, bribery and competition-law risks, implementing appropriate controls, ensuring relevant staff awareness and escalating identified concerns appropriately.

Employees and Business Partners

Employees and business partners must act honestly, comply with applicable law and CHC policies, avoid anti-competitive conduct and report any suspected or actual fraud, bribery or anti-competitive behaviour immediately.

7. Procedures and Risk Mitigation

CHC will maintain proportionate measures to prevent and detect fraud, bribery and anti-competitive behaviour. These measures include, as appropriate:

- Annual reissue and communication of this policy.
- Fraud, anti-bribery and relevant competition-law awareness or training for decision-makers and employees whose roles create relevant risks.
- Identification and assessment of competition-law risks as part of CHC's risk-management processes.
- Particular consideration of competition-law risks in tendering, estimating, procurement, commercial negotiations, sales and business-development activities.
- Contractual obligations requiring suppliers and subcontractors to comply with applicable law and CHC's relevant policies.
- Due-diligence checks on business partners, intermediaries and, where appropriate, higher-risk commercial arrangements.
- Appropriate review of proposed joint working, collaborations or arrangements involving competitors where competition-law risks may arise.
- Segregation of duties, approval limits and financial controls.
- Procedures for reporting suspected fraud, bribery or anti-competitive conduct, including confidential reporting channels.
- Appropriate management review and monitoring of identified risks and the effectiveness of relevant controls.

8. Training and Awareness

CHC will provide appropriate training and awareness to employees whose roles expose them to relevant fraud, bribery or competition-law risks.

Competition-law awareness will be particularly relevant to employees and decision-makers involved in:

- Tendering and estimating.
- Procurement and subcontractor selection.
- Pricing and commercial negotiations.
- Sales and business development.
- Meetings or communications with competitors.
- Industry associations, trade events or collaborative commercial activities.

Training and awareness requirements will be reviewed periodically to ensure they remain proportionate to CHC's activities and identified risks.

9. Due Diligence and Third Parties

CHC recognises that third parties can create fraud, bribery and competition-law risks.

Appropriate due-diligence checks will therefore be undertaken on business partners, intermediaries, suppliers, subcontractors and other relevant third parties, proportionate to the nature and level of risk.

Where appropriate, due diligence may consider:

- The identity and ownership of the third party.

- Reputation and previous conduct.
- Relevant legal or regulatory concerns.
- Potential conflicts of interest.
- The nature and purpose of the proposed relationship.
- Competition-law risks associated with the proposed arrangement.

Third parties are expected to comply with applicable law and CHC's relevant requirements.

10. Reporting and Investigation

Any suspected fraud, bribery, corruption or anti-competitive behaviour must be reported immediately to a Director or designated compliance contact.

Reports will be investigated promptly, confidentially and proportionately.

CHC will not tolerate retaliation against any person who raises a genuine concern in good faith.

Employees found to have engaged in fraudulent, bribery or unlawful anti-competitive activity may face disciplinary action, including dismissal, and the matter may be referred to the appropriate authorities or regulatory bodies where appropriate.

Employees may be suspended during investigations where necessary.

11. Suppliers and Subcontractors

Suppliers and subcontractors must comply with this policy and applicable law.

CHC expects suppliers and subcontractors to conduct their activities fairly and not engage in fraud, bribery, collusion, bid rigging, price fixing or other unlawful anti-competitive conduct.

CHC reserves the right to investigate concerns and, where appropriate and contractually permitted, terminate a relationship where fraud, bribery or unlawful anti-competitive conduct is discovered.

12. Monitoring and Compliance

Directors and designated senior management will monitor the effectiveness of the controls and procedures established under this policy.

Monitoring may include consideration of:

- Identified fraud, bribery and competition-law risks.
- Reported concerns and incidents.
- Relevant training and awareness requirements.
- Due-diligence activity.
- Effectiveness of existing controls.
- Changes to applicable legislation and regulatory guidance.
- Lessons learned from investigations or identified issues.

Where weaknesses or new risks are identified, CHC will consider appropriate corrective or preventative action.

All employees must comply with this policy and promote its principles.

Employees can seek guidance from their line manager, a director or designated compliance contact where they have concerns about the application of this policy.

13. Review

This policy will be reviewed at least annually and updated where necessary to reflect legislative changes, regulatory requirements, best practice, identified risks, lessons learned or changes to CHC's business activities.

The Directors are responsible for ensuring that the policy remains appropriate and effective.

Signed.....

Date: 26th August 2026

Name: Mike Goodier - Managing Director

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