ANTI BRIBERY AND CORRUPTION POLICY UNITS 1 AND 7

1. Andel Ltd is dedicated to ensuring full compliance with all anti-bribery and corruption laws and regulations, including the Bribery Act 2010. Its Anti-Bribery Policy extends to all the Company's business dealings and transactions; in all countries in which it or its subsidiaries and associates operate. An associate includes subcontractors, joint venture partners and agents. Our policy is that no employee; associate or agent shall pay bribes or offer improper inducements to anyone for any purpose, nor do we or will we, accept bribes or improper inducements.
2. Andel Ltd expects its employees to demonstrate honesty, integrity and fairness in all aspects of their business dealings and exercise appropriate standards of professionalism and ethical conduct in all their activities. To use a third party as a conduit to channel bribes to others is a criminal offence, as detailed within The Proceeds of Crime Act 2002. Andel Ltd do not; and will not, engage indirectly in or otherwise encourage bribery.
3. Andel Ltd takes bribery and corruption very seriously; and will not tolerate bribery or corruption in any form and has a 'zero tolerance' approach to any breach of this policy. All Directors and employ- ees of Andel Ltd are required to comply with the policy. We encourage all employees to report any suspicious activity that may violate this policy. There is a confidential and discrete way to report any violations or suspicious activity that is described below.

Bribery

1. The offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action which is illegal or a breach of trust.

It is unacceptable to:

a) Give, promise to give, or offer a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given.
b) Give, promise to give, or offer a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure.
c) Accept payment from a third party that you know, or suspect is offered with the expectation that it will obtain a business advantage for them.
d) Accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return.

e) Retaliate against or threaten a person who has refused to commit a bribery offence or who has raised concerns under this policy.
f) Engage in activity in breach of this policy.

Objective of this Policy

1. This policy provides a coherent and consistent framework to enable Andel Ltd employees to under- stand and implement arrangements, enabling compliance. In conjunction with related policies and key documents; it will also enable employees to identify and effectively report a potential breach.

We require that all staff, including those permanently employed, temporary agency staff and contractors to:

a. Act honestly and with integrity always and to safeguard the organisation's resources for which they are responsible.
b. Comply with the spirit; as well as the letter, of the laws and regulations of all jurisdictions in which Andel Ltd operates, in respect of the lawful and responsible conduct of activities.

Scope of this Policy

1. This policy applies to all Andel Ltd activities. For partners, joint ventures and suppliers, we will seek to promote the adoption of policies consistent with the principles set out in this policy. Within the company, the responsibility to control the risk of bribery occurring resides at all levels of the Company. It does not rest solely within assurance functions, but in all business units and corporate functions.
2. This policy covers all staff; including all levels and grades, those permanently employed, temporary agency staff, contractors, agents, members (including independent members), volunteers and consultants.

Andel Ltd Commitment to Action

Andel Ltd commits to:

a) Setting out a clear anti-bribery policy and keeping it up to date.
b) Ensure a systematic approach to risk assessment of the nature and extent of bribery risk associated within the construction industry and global market.
c) Making all employees aware of their responsibilities to always adhere strictly to this policy.
d) Training all employees so that they can recognise and avoid the use of bribery by themselves and others.

e) Encouraging its employees to be vigilant and to report any suspicions of bribery; providing them with suitable channels of communication and ensuring sensitive information is treated appropriately in a confidential manner to a designated senior manager.
f) Ensure that our suppliers; agents, intermediaries and fellow participants in joint ventures are fully aware of their responsibility for and are committed to complying with our Anti- Bribery Policy.
g) Taking firm and vigorous action against any individual(s) involved in bribery.
h) Provide information to all employees; to report breaches and suspected breaches of this policy.
i) Include appropriate clauses in contracts to prevent bribery.

Facilitation Payments

1. Andel Ltd prohibits 'facilitation' or 'grease' payments as these are bribes and illegal. Facilitation payments are commonly small payments made to secure or speed up routine actions; usually by public officials, such as issuing permits, immigration controls, providing services or releasing goods held in customs. It is also our policy that we work to ensure that our agents and other intermediaries; joint ventures and consortia, contractors and suppliers do not make facilitation payments on our behalf.
2. If you have doubts about a payment and suspect that it might be considered a facilitation payment; only make the payment if the official or third party can provide a formal receipt or written confirmation of its legality. If practicable, obtain senior management/legal approval for the payment or consult the Managing Director, Peter Double. If the demand is accompanied by immediate threat of physical harm, then put safety first; make the payment and report immediately to senior management the circumstances and amount of the payment made 'under duress'.

Gifts, Hospitality and Expenses

1. Andel Ltd prohibit the offer or receipt of gifts; hospitality or expenses whenever they could affect or be perceived to affect the outcome of business transactions and are not reasonable, proportionate and bona fide. Whether any corporate hospitality is improper is judged by reference to what a rea- sonable person in the UK would expect. The 2010 Bribery Act and this policy does not prevent corporate hospitality. It requires a sensible approach to hospitality to be used to ensure that promotional business expenditure that seeks to improve the image,

better presents services or establishes cordial relations is reasonable and proportionate.

Example criteria to test if gifts, hospitality or reimbursed expenses comply with the Anti-Bribery pro- gramme:

a) **Made for the right reason:** if a gift or hospitality, it should be given clearly as an act of appreciation, if travel expenses then for a bona fide business purpose e.g., provision of air- port transfers, dining or tickets to an event to facilitate a client meeting.
b) **No obligation:** the gift, hospitality or reimbursement of expense should not place the recipient under any obligation.
c) **No expectations:** expectations are not created in the giver or an associate of the giver or have a higher importance attached to it by the giver than the recipient would place on such a transaction.
d) **Made openly:** if made secretly and undocumented then the purpose will be open to question.
e) **Accords with stakeholder perception:** the transaction would not be viewed unfavourably by stakeholders if it were to be made known to them.
f) **Reasonable Value:** the size of the gift is small, and the value of the hospitality or reimbursed expense accords with general business practice.
g) **Appropriate:** the nature of the gift, hospitality or reimbursed expense is appropriate to the relationship and accords with general business practice and local customs.
h) **Legality:** It is compliant with relevant laws.
i) **Conforms to the recipients' rules:** the gift, hospitality or reimbursement of expenses meets the rules or code of conduct of the recipient's organisation.
j) **Infrequent:** the giving or receiving of gifts and hospitality is not overly frequent between the giver and the recipient.
k) **Documented:** the expense is fully documented including purpose and approvals given and properly recorded in the financial accounts.
l) **Reported:** the gift, hospitality or expense is recorded and reported to management.

2. Sample tokens of modest value bearing the name or insignia of the organisation giving them (for ex- ample, pens, diaries or calendars) whether given personally, or received in the post, may be retained unless they could be regarded as an inducement or reward. If in doubt you should refuse the offer or invitation (or return the gift) unless your line manager has advised, you that it may be accepted or retained.

Staff Responsibilities

1. The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for Andel Ltd or under its control. All staff are required to avoid activity that breaches this policy.
2. You must ensure that you read, understand and comply with this policy and raise concerns as soon as possible; if you believe or suspect that a conflict with this policy has occurred or may occur in the future. As well as the possibility of civil and criminal prosecution, employees that breach this policy will face disciplinary action, which could result in summary dismissal for gross misconduct.

Raising a Concern

1. Andel Ltd is committed to ensuring that all of us have a safe; reliable, and confidential way of reporting any suspicious activity. We all have a responsibility to help detect; prevent and report instances of bribery. If you have a concern regarding a suspected instance of bribery or corruption; please speak up – your information and assistance will help. If you have any concerns, please contact the Managing Director or one of the other directors of the company or senior managers as required.
2. If an incident of bribery; corruption, or wrongdoing is reported, we will act as soon as possible to evaluate the situation. Staff who refuse to accept or offer a bribe; or those who raise concerns or report wrongdoing can understandably be worried about the repercussions. Andel Ltd aims to encourage openness and will support anyone who raises a genuine concern in good faith under this policy, even if they turn out to be mistaken. Andel Ltd is committed to ensuring nobody suffers detrimental treatment through refusing to take part in bribery or corruption, or because of reporting a concern in good faith.

Peter Double

Managing Director

13th April 2026

Rev 2.0