



Anti Bribery and Corruption

BS(D).40.01

April 24

Bribery is a criminal offence. We do not, and will not, pay bribes or offer improper inducements to anyone for any purpose, nor do we or will we accept bribes or improper inducements. To use a third party as a conduit to channel bribes to others is a criminal offence. We do not, and will not, engage indirectly in or otherwise encourage bribery.

Gifts, entertaining, conflicts of interests and bribes

Ethical difficulties can arise in a number of ways. They can occur if any employee is offered hospitality, gifts or personal services by a supplier or a customer. Bribery is a criminal offence under the Bribery Act 2010, and it will not be tolerated under any circumstances. Breach of this provision constitutes a gross misconduct offence.

Whilst engaged on the business of the Company, employees of Bridgestone are expressly prohibited from offering, promising or giving a bribe, or requesting, agreeing to receive or accepting a bribe. In such situations you are required to observe the following rules:

- At all times and in all respects act in the best interests of the Company and use your best endeavors to promote, develop and extend the Company's business and interests
- Take all necessary steps to avoid conflicts of interest and to report to the Company any possible conflict of interest
- Immediately disclose to the Company any knowledge or suspicion you may have that you, or any other employee or officer of the Company, has plans to commit a serious breach of duty or serious wrongdoing, or that you or they are not observing rules or procedures for the proper conduct of the Company's business.
- Immediately disclose to the Company any knowledge or suspicion you may have that you, or any other employee, officer or agent of the Company, has plans to offer, promise or give a bribe or to request, agree to receive or accept a bribe in connection with the business of the Company contrary to the Bribery Act 2010.
- Report to the Company any direct or indirect approaches that are made to you by any business that may be in direct or indirect competition with the Company's business.
- Report to the Company any hospitality, gifts or personal services offered by a supplier or a client
- Do not extend or receive any gifts, services, hospitality or entertainment without prior approval from your Manager
- Do not conduct personal business with suppliers or customers without prior approval from your Manager

Workplace Environment

We ensure an environment of respect and trust wherein each employee is valued as an individual. We achieve high performance standards for safety, health and environmental management throughout our organisation.

Each employee has a responsibility to uphold Bridgestone Construction Ltd policies and identify areas of perceived wrongdoing.