

COUNTERING CORRUPTION & BRIBARY POLICY

Ferguson Construction Ltd does not tolerate corruption or bribery in any form. Ferguson Construction Ltd prohibits the offering or payment of bribes, kickbacks or any other improper benefits to actual or potential customers, clients, contractors, suppliers and government officials, employees of these entities or any other party. Similarly, Ferguson Construction Ltd employees shall not demand, arrange or accept bribes, kickbacks or other improper benefits from any entity for the benefit of the employee or the employee's family, friends, associates or acquaintances, or any other person.

This policy has been adopted by Ferguson Construction Ltd's Management. Members of the management team shall implement procedure to ensure compliance with this policy and, as required, shall adopt local policies and procedures stricter than those set forth here. Failure to comply with the provisions of this Policy will result in disciplinary action. The term management refers to any person in a position of responsibility over others.

Guidance to ensure compliance with this Policy:

Bribes, kickbacks and other improper benefits

Ferguson Construction Ltd prohibits the following improper business payments and practices. Some may constitute criminal offences and can subject offenders to substantial fines, imprisonment, or both.

- Payments by or on behalf of Ferguson Construction Ltd which are unlawful under the laws of any country, state, city and/or country, or any jurisdiction.
- Offering, giving, demanding or receiving bribes, payoffs, kickbacks, or other improper payments to or from customers, contractors, agents, agents, suppliers or government officials, employees of these entities, or any other person or entity;
- Payment of rebates or other deviations from normal terms of sale outside of the country where the business is being conducted, where the payments would violate the laws of the country where the business is being conducted.
- Payments by or on behalf of Ferguson Construction Ltd with the intention or understanding that a part or all of such payment is to be used for any purpose other than that described by the document supporting the payment.

Gifts, Hospitality and Expenses

Gifts, hospitality and expenses offered to or received from employees of customers or suppliers (including prospective customers or suppliers) must meet the following criteria:

- Gifts, hospitality and expenses shall comply with normally accepted business practices, and comply with the policies of the organisation employing the recipient;
- Gifts, hospitality and expenses can only be offered if they are considered legal and comply with generally acceptable ethical practices in the area of operations. such gifts,

hospitality or expenses must be an ordinary social amenity or normal business sales promotion;

- The facts surrounding the gift, hospitality or expenses would not be embarrassing to Ferguson Construction Ltd if disclosed;
- Lavish expenditure shall be avoided when entertaining an employee of a customer, supplier or prospective customer or supplier;
- Ferguson Construction Ltd employees may not accept hospitality, expenses or gifts from customers, suppliers, or prospective customers or suppliers where the cost to the host would appear to be more than is reasonable and customary;
- Ferguson Construction Ltd employees may not accept hospitality, expenses or gifts from any customers, suppliers or prospective customers or suppliers that unduly influence or prejudice the relationship.

Guidance and Reporting

Whenever in doubt about a particular situation, employees are required to consult with a manager of a higher rank in the employee's line of reporting and, as necessary, to make an inquiry to other relevant internal persons for guidance. Such guidance must be made in writing. Employees are required to report any actual or potential non-compliance to relevant internal officers, with the assurance that there will be no retaliation or other negative consequences for persons reporting in good faith. Reports of violations of this policy may be submitted anonymously and confidentially to the Managing Director of Ferguson Construction Ltd.

Guidance on Acceptance of Gifts or Hospitality.

Any member of the management team who is offered or accepts any gift or hospitality must record it in a Register of Interests. This is to ensure that any item such as gifts and hospitality is available for scrutiny by external and internal auditors and to ensure no illegal or unethical activities are being undertaken.

It is the responsibility of the person receiving the gift or hospitality to ensure it is recorded in the register failure to do so may lead to disciplinary action. The register of interests will be held in the office for all employees to view should they wish.

Signed:



Mr. Alan Ferguson
Managing Director
September 2018