

# Anti-Bribery & Corruption Policy

FCE Projects Limited's mission is to be a resilient organisation that protects the environment, improves the lives of our people, supports the communities we serve and brings economic benefit for our region. Our business was founded in 2004 and we have always upheld company values and a principles-based approach to doing business, that ensures we are:

- Focused - *driven by our customer needs.*
- Collaborative - *working across project stakeholders to deliver the best solutions.*
- Ethical - *acting with integrity, equality, fairness, and respect.*
- Responsible - *doing the right thing for society and the planet.*

FCE Projects Ltd is fully committed to carrying out business fairly, honestly, and openly. The company's objective is to prevent bribery by persons associated with it and we aim to create and maintain an anti-bribery culture within the company. FCE Projects has established several procedures to prevent bribery based on an assessment of the risks associated with the potential for bribery.

Our procedures are proportionate to the identified risks and the nature, scale and complexity of the company's activities and are designed to ensure that the company complies with current legislation concerning bribery. They have been established to mitigate identified risks and prevent deliberate unethical conduct on the part of company employees and associated persons.

It is the policy of FCE Projects Ltd to:

- Prohibit the offer, gift, or acceptance of bribes in relation to any aspect of its business.
- Ensure procedures for controlling company expenditure, including accounting, approval of expenditure, bookkeeping and auditing are sufficiently robust to prevent bribery.
- Prohibit payment of donations to political parties and charities directly linked to obtaining new business.
- Ensure that donations to nominated charities or other recognised good causes are made in good faith, and publicly disclosed.
- Ensure that provision of gifts, hospitality or expenses is proportionate and reasonable to the company's business.
- Provide appropriate information and instruction relating to the company's anti-bribery procedures for all employees, consultants, and sub-contractors.
- Allocate sufficient resources to enable the Policy to function effectively.

The next review date for this policy is January 2023.



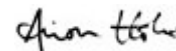
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**January 2022**