# ANTI-BRIBERY POLICY STATEMENT

Bachy Soletanche Ltd (BSL) is a specialist geotechnical contractor providing ground investigation, foundation, and geotechnical solutions for the construction industry. We are committed to conducting business fairly, honestly, and in compliance with the Bribery Act 2010, Competition Act 1998 and Enterprise Act 2022, with a zero-tolerance policy towards bribery and corruption.

**Prohibited conduct**

Under the Acts, the following actions and definitions are prohibited:

- Bribing another person – Offering or giving anything of value to induce improper conduct.
- Being bribed – Accepting or requesting gifts of value in exchange for improper performance or to influence decision.
- Bribing a foreign public official – Providing undue advantage to gain business influence.
- Failing to prevent bribery – BSL is responsible for preventing bribery by employees and business partners.
- Corruption – Abusing entrusted power for private gain
- Facilitation payments – making small unofficial payments made to speed up routine government actions
- The use of third parties to bypass this Policy.

These offences apply to BSL and its employees whether the bribe is direct or indirect.

**Compliance with Anti-Bribery and Corruption Laws**

To ensure compliance with the Bribery Act 2010, BSL will:

- Require all staff to read and acknowledge this Policy annually.
- Appoint a Director responsible for legal compliance.
- Require Director approval and recording of gifts, hospitality and donations.
- Maintain accurate financial records and transparent accounting.
- Conduct due diligence on suppliers, partners and agents.
- Require reporting of suspected bribery, with confidentiality protections.

**Prohibited Anti-Competitive Behaviour**

Under the Competition Act 1998 and Enterprise Act 2002, staff must not engage in:

- Price fixing.
- Bid rigging.
- Market or customer allocation.
- Sharing commercially sensitive information with competitors.
- Abuse of market dominance (if applicable).
- Exclusive arrangements that may restrict competition.

**Compliance with UK Competition Laws**

To ensure compliance, the Company will:

- Provide annual briefings to ensure staff awareness.
- Prohibit sharing/requesting sensitive information with competitors.
- Require Director review of collaborations or industry forums.
- Review commercial contracts for anti-competitive terms.

- Retain pricing and strategic decision records to demonstrate independent decision-making.

**Detection of Prevention and Anti-Competitive Behaviour**

Arrangements in place include:

- Director approval for competitor contact or meetings.
- Documented agendas and notes for industry event attendance.
- Periodic review of procurement and sales activity.
- Internal reporting mechanisms for concerns.
- Annual review of agreements and practices.

**Our Ethical Approach**

BSL upholds the Vinci Code of Ethics and Conduct, which reinforces our commitment to:

- Full compliance with laws and regulations.
- Integrity in business dealings, free from bribery or corruption.
- Careful selection of ethical business partners.
- Strict anti-competitive behaviour policies.
- Ensuring employees and associated persons do not offer or accept improper benefits.

**Reporting Concerns**

Employees and third parties are encouraged to report concerns through:

- Their line manager, senior manager or Director.
- Email: ethics@vinci.com
- Website: vinci-integrity.com

**Consequences of Non-Compliance**

- Unlimited fines and potential exclusion from public contracts.
- For individuals: Up to 10 years imprisonment, unlimited fines, and director disqualification.
- For employees: Disciplinary action, including potential dismissal for gross misconduct.

**Policy Implementation**

BSL ensures adequate procedures are in place to prevent bribery. This policy, which is reviewed annually, is communicated to all employees and persons working on our behalf and made publicly available to interested parties via our website.

**Approved by:** **Date: 19/08/2026**

Tamas Kaltenbacher

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**Tamas Kaltenbacher, BSL Managing Director**