

One of MODUTEC 5 Values is 'Demonstrate Integrity and Respect', we will continually strive to demonstrate care, honesty and fairness in all of our dealings, with all of our stakeholders. MODUTEC is committed to promoting and maintaining the highest level of ethical standards in relation to all of its business activities. Our reputation for maintaining lawful business practices is of paramount importance and this Policy is designed to preserve these values. MODUTEC therefore has a zero tolerance Policy towards bribery and corruption and is committed to acting fairly and with integrity in all of its business dealings and relationships and to implementing and enforcing effective systems to counter bribery.

The Bribery Act 2010 (the Bribery Act) came into force on 1 July 2011. The Bribery Act affects MODUTEC in its business relations anywhere in the world.

All persons under the control of MODUTEC are expected to adhere strictly at all time to the principles set out in this Policy.

This Policy Statement sets out the steps all of us must take to prevent bribery and corruption in our business and to comply with relevant legislation. It is aimed at:

- Ensuring compliance with anti-bribery laws, rules and regulations, not just within the UK but in any other country within which the Company may carry out its business or in relation to which its business may be connected;
- Enabling any Relevant Person to understand the risks associated with bribery and to encourage them to be vigilant and effectively recognise, prevent and report any wrongdoing, whether by themselves or others;
- Providing suitable and secure reporting and communication channels and ensuring that any information that is reported is properly and effectively dealt with;
- Creating and maintaining a rigorous and effective framework for dealing with any suspected instances of bribery or corruption.

Any involvement in Bribery or corruption carries many risks to our purpose and strategic direction, equally, there are very clear benefits to acting with propriety. These include:

- Increased chances of being selected as a supplier in target sectors;
- MODUTEC remains in good standing with our banks and our own Clients and Suppliers, and they will want to keep doing business with us;
- A business with high ethical standards is a good place to work

All persons under the control of MODUTEC are required at all times:

- Not to commit an offence listed within the Bribery Act;
- To comply with the Bribery Act and any other anti-bribery and anti-corruption legislation that applies in any jurisdiction in any part of the world in which they or MODUTEC might conduct business;
- To act honestly, responsibly and with integrity;
- To safeguard and uphold MODUTEC's Values by operating in an ethical, professional and lawful manner at all times.

Bribery of any kind is strictly prohibited. Under no circumstances should any provision be made, money set aside or accounts created for the purposes of facilitating the payment or receipt of a Bribe.

It is not acceptable to 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, or to accept a payment, gift or hospitality from a third party that you know or suspect is offered or provided with the expectation that it will obtain a business advantage for them. MODUTEC's provisions regarding Facilitation Payments, Political Contributions, Charitable Donations and Local or Exceptional Circumstances are detailed in our Anti-Bribery & Corruption procedure.

All Relevant Persons are contractually required to take whatever reasonable steps are necessary to ensure compliance with this Policy and to prevent, detect and report any suspected Bribery or corruption. All Relevant Persons have a duty to prevent, detect and report any incident of Bribery and any potential risks of Bribery. MODUTEC is committed to taking appropriate action against Bribery and corruption.

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This may include either reporting the matter to an appropriate external government department, regulatory agency or the police and/or taking internal disciplinary action against relevant employees and/or terminating contracts with associated persons.

MODUTEC will keep disclosures confidential during any investigation it undertakes to the extent that this is practical and appropriate in the circumstances. MODUTEC will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. MODUTEC is also committed to ensuring nobody suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or corruption offence has taken place or may take place in the future or because they may assist in the investigation of an allegation of Bribery or corruption. Refer to our Whistleblowing Policy Statement and Procedure for further details.

A breach of any of the provisions of this Policy by any Relevant Person who is an Officer or Employee of MODUTEC will constitute a disciplinary offence and will be dealt with in accordance with MODUTEC's Disciplinary procedure. Depending on the gravity of the offence, it may be treated as Gross Misconduct and could render the Officer or Employee liable to summary dismissal.

Breach of this policy by any Relevant Person who is an Assignee or Consultant providing their services to the Company may lead to the immediate termination of that Assignee or Consultant's engagement by MODUTEC.

Breach of this policy by any Relevant Person which is a corporate entity could lead to the suspension or termination of any relevant contract, sub-contract or other agreement between the corporate entity and MODUTEC.



**Brian Knowles**  
**Managing Director**



**Chris Andrew**  
**Operations Director**