MACINNES BROS LTD

BUILDING, CIVIL ENGINEERING & BUILDERS MERCHANT

Anti-Bribery and Corruption Policy Statement

January 2026

ANTI – BRIBERY AND CORRUPTION STATEMENT

MacInnes Bros Ltd is committed to applying the highest standards of ethical conduct and integrity in its business activities. Every employee and individual acting on behalf of MacInnes Bros Ltd is responsible for conducting company business honestly and professionally.

MacInnes Bros Ltd considers that bribery and corruption has a detrimental impact on business by undermining good governance and distorting free markets.

MacInnes Bros Ltd does not tolerate any form of bribery by, or of, its employees or any persons or companies acting for it or on its behalf. The Managing Director and senior management are committed to implementing and enforcing effective systems to prevent, monitor and eliminate bribery, in accordance with the Bribery Act 2010.

Employees and others acting for or on behalf of MacInnes Bros Ltd are strictly prohibited from making, soliciting or receiving any bribes or unauthorised payments. As part of its anti-bribery measures, MacInnes Bros Ltd is committed to engage only in transparent, proportionate, reasonable and bona fide hospitality and promotional expenditure.

A breach of company policy by an employee will be treated as grounds for disciplinary action, which may result in a finding of gross misconduct and immediate dismissal. Employees and other individuals acting for MacInnes Bros Ltd should note that bribery is a criminal offence that may result in up to 10 years' imprisonment and/or an unlimited fine for the individual and an unlimited fine for MacInnes Bros Ltd.

The success of MacInnes Bros Ltd anti-bribery measures depends on everyone playing their part in helping to detect and eradicate bribery. Therefore, all employees and others acting for, or on behalf of, MacInnes Bros Ltd are encouraged to report any suspicious activity in confidence to the Managing Director, Ewen P MacInnes, who will support any individuals who make such a report in good faith.

Suspected or confirmed breaches will be reported to the police / relevant authorities.

Suppliers will be removed from MacInnes Brothers Limited Approved Supplier lists and not used again.

Signed: Managing Director Date: 08.01.2026