

## **Hummerston Engineering Ltd**

### **Anti-Bribery and Corruption Policy**

Hummerston Engineering is committed to maintaining the highest standards of integrity and ethical conduct. We have a zero-tolerance approach towards bribery, corruption, and fraud. This policy outlines our commitment to preventing these activities and complies with the Anti Bribery Act 2010, UK Criminal Finances Act 2017 and other applicable legislation.

Employees, contractors, and anyone associated with Hummerston Engineering are strictly prohibited from:

- Offering, giving, receiving, or soliciting any form of bribe.
- Engaging in corrupt practices.
- Committing fraud against the company or its stakeholders.

All employees, regardless of their position, have a responsibility to:

- Understand and comply with this policy.
- Report any suspected incidents of bribery, corruption, or fraud promptly.

Managers must ensure that their teams are aware of this policy and receive adequate training.

Hummerston Engineering will conduct due diligence on all parties with whom it does business to mitigate the risk of involvement in bribery, corruption, or fraud.

Any employee who suspects or becomes aware of a violation of this policy must report it immediately to their manager or use the designated whistleblowing channel.

Hummerston Engineering will promptly and thoroughly investigate any reported or suspected violations of this policy. Appropriate actions, including legal actions, may be taken if wrongdoing is substantiated.

Violations of this policy will result in disciplinary action, including potential termination of employment. Legal action may also be pursued.

This policy is available to all employees, contractors and interested parties. It is also explained to all employees and anyone who is working on our behalf before commencement of work.

This Anti Bribery & Corruption Policy will be reviewed annually or as needed to ensure ongoing compliance with relevant legislation. Any changes to this policy will be communicated to all employees and relevant parties.

**Chris McClinton**  
**Managing Director, Hummerston Engineering Ltd**  
**Dated: 5<sup>th</sup> January 2026**