

HR52 Anti Bribery Policy

Speller Metcalfe is committed to complying with UK competition law in order to preserve free, fair and efficient competition for the benefit of all companies operating in the industry and its clients. We ensure this through promoting an understanding of, and compliance with, competition law throughout our organisation and with our supply chain and sub-contractors.

We agree to meeting the highest levels of competition law compliance by adhering to the principles of fair competition and ensuring that we do not engage in any non-competitive practices.

In order to ensure this we commit to the following:

- Speller Metcalfe will not restrain competition with our competitors through agreements, arrangements or understandings that restrict competition;
- Speller Metcalfe will bid for contracts independently from, and without agreement or arrangement, any of its competitors;
- Speller Metcalfe will not exchange sensitive information or engage in discussions that may lead to the co-ordination of competitive behaviour;
- Speller Metcalfe will not share information about future or current pricing intentions for tenders that might affect prices or pricing practices with any competitors

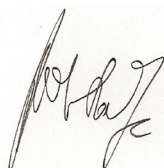
Exceptions to the above may be permitted by competition rules if co-operation is expressly required by the client in the event of certain framework agreements/joint venture contract - in such cases any arrangements will be fully disclosed to the client.

Signed on behalf of Speller Metcalfe Limited



S R Speller

Joint Owner
Speller Metcalfe Limited



A J Metcalfe

Joint Owner
Speller Metcalfe Limited

Last Reviewed Date: 31st March 2021

Next Review Date: 31st March 2022