



ANTI-BRIBERY & CORRUPTION POLICY

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Full Policy & Procedures: Available on request

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Statement

Alia Steel Fixing Ltd is committed to conducting its business honestly, ethically and responsibly, and to preventing bribery, corruption, fraud, improper influence and unethical business practices within our business activities and supply chains.

We recognise that bribery and corruption can occur in any sector, including construction, subcontracting, procurement and labour supply chains. We are committed to maintaining working practices that support transparency, fair competition, lawful conduct and compliance with applicable anti-bribery, corruption, fraud, financial crime, employment, procurement, health and safety, and business legislation.

Alia Steel Fixing Ltd provides steel fixing services across commercial, residential, public sector and infrastructure projects. Our work is delivered through competent supervision, skilled operatives, subcontractors and suppliers, and we expect everyone working with or on behalf of the company to act lawfully, responsibly and in accordance with this Policy.

This Policy supports compliance with the Bribery Act 2010 and is based on proportionate controls, ethical conduct, due diligence, communication, record keeping and review.

Commitment

The objective of this Policy is, so far as is reasonably practicable, to help prevent bribery, corruption and unethical business conduct within our business and supply chains by supporting working arrangements that:

- act honestly, ethically and with integrity;
- comply with applicable legal, contractual and regulatory requirements;
- prohibit the offering, giving, requesting or accepting of bribes;
- prohibit facilitation payments, kickbacks and improper inducements;
- promote fair and transparent dealings with clients, principal contractors, subcontractors, suppliers and workers;
- avoid conflicts of interest and improper influence;
- maintain appropriate controls for gifts, hospitality, expenses, donations and business relationships;
- encourage the reporting of concerns;
- respond promptly to suspected breaches, risks or non-compliance.

Everyone working with, or on behalf of, Alia Steel Fixing Ltd must follow this Policy, support lawful and ethical working practices, report any concerns relating to bribery, corruption, fraud, improper payments, conflicts of interest or unethical conduct, and cooperate with any review or corrective action required.

Working Arrangements

We plan and manage our working arrangements to reduce the risk of bribery and corruption within our operations and supply chain.

Where required, we review the suitability of subcontractors, suppliers, labour providers and business partners before engagement and during project delivery. Our arrangements are proportionate to the nature of the work, the level of risk and the requirements of our clients and principal contractors.

Our arrangements include:

- engaging employees, workers, subcontractors and suppliers through appropriate and lawful arrangements;
- prohibiting bribes, kickbacks, facilitation payments and improper inducements;
- ensuring gifts and hospitality are reasonable, proportionate, transparent and not intended to influence business decisions;
- avoiding the use of subcontractors, suppliers or representatives who cannot demonstrate appropriate ethical standards;
- communicating expected standards to employees, supervisors, subcontractors and suppliers;
- cooperating with client, principal contractor and site compliance requirements;
- ensuring management and site supervisors remain alert to potential bribery, corruption or unethical conduct risks;
- encouraging workers and business partners to raise concerns about improper payments, pressure, gifts, hospitality, conflicts of interest or suspicious conduct;
- investigating reported concerns promptly and taking appropriate action;
- not tolerating threats, retaliation, intimidation or unfair treatment against anyone who raises a genuine concern;
- maintaining appropriate records where required for subcontractor, supplier, procurement, payment and project management;
- reviewing working practices where concerns, non-compliance or increased risk is identified.

We expect all employees, subcontractors and suppliers to support this Policy and to notify management immediately if they identify any issue that may indicate bribery, corruption, fraud, improper influence, conflicts of interest or unethical business conduct.

Any breach of this Policy may result in appropriate action, which may include removal from site, termination of engagement, notification to the client or principal contractor, and reporting to the relevant authorities where required.

Review

Alia Steel Fixing Ltd is committed to continually improving its approach to preventing bribery, corruption and unethical business conduct.

This Policy and its supporting arrangements are reviewed regularly and updated where necessary to reflect changes in legislation, client requirements, industry standards, working practices, supply chain arrangements and business activities.

We use feedback from clients, supervisors, operatives, subcontractors and project teams to improve our approach and strengthen our controls. Where concerns or risks are identified, we aim to address them promptly and take appropriate steps to reduce the likelihood of recurrence.

This Policy is supported by our internal management arrangements and project-specific procedures, which are available on request where applicable.

For and on behalf of Alia Steel Fixing Ltd

A handwritten signature in black ink, appearing to read 'Malik Alia', written in a cursive style.

Mr Malik Alia
Director

Date: 22 May 2026