

ANTI BRIBERY POLICY STATEMENT

Soil Engineering Geoservices Limited (SEGL) is a specialist geotechnical contractor carrying out ground investigation, foundation, and specialist geotechnical work for the construction industry.

The Anti Bribery Policy Statement ("the policy") is provided in connection with the Bribery Act 2010 which came into force with effect from the 1st of July 2011, and all employees and associated persons must be made aware of the act and of its provisions.

Soil Engineering Geoservices Limited is committed to adhering strictly to all bribery laws.

No act of bribery will be tolerated, and we will take all necessary steps to ensure that it conducts its business in an open and ethical manner, with honesty and integrity.

We are fully committed to open and fair competition in this regard and do not condone any activity which might in any way unfairly restrict the level of competition expected by our clients and procuring authorities. We will do all that we can to ensure that those procuring our services enjoy fully the benefit of open and fair competition.

The potential consequences of breaching bribery law are serious for Soil Engineering Geoservices Limited, individual employees and other stakeholders. A Bribery Act 2010 conviction carries a penalty of a fine or 10 years imprisonment (or both) for individuals found guilty of any offences, together with an unlimited fine for Soil Engineering Geoservices Limited if found guilty of the corporate offence of failing to prevent bribery. In addition, we could face convictions under the Economic Crime & Corporate Transparency Act and would face exclusion from tender opportunities.

Accordingly, it is Soil Engineering Geoservices Limited policy to ensure that its activities are conducted in accordance with all bribery laws. This Policy is not intended to set out in detail the Soil Engineering Geoservices Limited approach to prevention of bribery. Detailed guidance, including an explanation of defined terms and the procedures to be followed, are all set out in the Code of Ethics and Conduct, Anti-Corruption Code of Conduct and The Group Code of Ethics.

Material and/ or deliberate disregard of this Policy or the related Code of Ethics and Conduct, Anti-Corruption Code of Conduct and The Group Code of Ethics will be viewed extremely seriously and will be regarded as a disciplinary matter.

This Policy is supplemental to and should be read in conjunction with other Soil Engineering Geoservices Limited Policies and documents. As a wholly owned subsidiary of VINCI, these also include the VINCI Code of Ethics and Conduct, VINCI Anti-Corruption Code of Conduct, and the VINCI Group Code of Ethics.

If employees are uncertain about the application of this Policy or the related Codes to their day-to-day activities, or are uncertain about the legality of an agreement, arrangement, or course of conduct they should always seek advice from their line manager or a Board Director.



Tristan Llewellyn
Managing Director
May 2026

Approved by:
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(Managing Director)

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Date: 01/04/2026 | **Page 1 of 3**

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1.0 Purpose

To set out the Soil Engineering Geoservices Limited policy in relation to the prevention of bribery and Bribery Act 2010 (the "Act") compliance.

2.0 Introduction

Soil Engineering Geoservices Limited is fully committed to conducting its business with the highest level of integrity and honesty and will put into place proportionate processes and procedures to prevent as far as practicable any acts of bribery.

The processes implemented shall be reasonable and proportionate having regard to the nature and extent of the bribery risk that Soil Engineering Geoservices Limited faces, considering such factors as the sectors in which Soil Engineering Geoservices Limited operates, the existing and potential clients/ supply chain, and the relevant statutory, regulatory, contractual and/or professional obligations and duties applying to Soil Engineering Geoservices Limited.

3.0 Policy

3.1 Compliance with the Law

Soil Engineering Geoservices Limited is required to comply with the Act and the procedures in place at Soil Engineering Geoservices Limited to ensure compliance.

Four distinct categories of bribery are provided for in the Act which, if breached will constitute a criminal offence: -

- **Bribing (or attempting to bribe) another person.**

This is defined as the giving, promising, or offering of a bribe, which can include hospitality or gifts, with intent to induce improper conduct by the recipient of the bribe. **Note** however that there is nothing in the act which prevents the giving of reasonable entertainment and gifts.

- **Being bribed (soliciting or receiving).**

This is defined as the requesting, accepting, or agreeing to receive a payment or other advantage in return for the improper performance of a duty.

- **Bribing a foreign public official.**

Failure of a commercial organisation to prevent Associated Persons (i.e., joint venture partners, subcontractors, suppliers, agents etc.) paying bribes on its behalf.

- **Corporate offence of failing to prevent bribing.**

If a company fails to prevent an "Associated Person" from paying a bribe for its benefit, an offence is committed.

The consequences of infringing the Act are extremely serious for individual employees, Soil Engineering Geoservices Limited and the wider Vinci Group, and other stakeholders. Aside from serious reputational damage, a Bribery Act conviction carries a penalty of a fine or 10 years imprisonment (or both) for individuals found guilty of the offences, and an unlimited fine for the corporate offence of failing to prevent bribery. In addition, Soil Engineering Geoservices Limited could face convictions under the Economic Crime & Corporate Transparency Act and would face exclusion from public sector tender opportunities.

These offences, for the Company, its Subsidiaries, Associated Companies and Employees, apply regardless of where in the world the bribes are offered or received, and whether the bribe is direct or indirect via a subsidiary or a third party.

There is a strict obligation on companies to comply with the Bribery Act and ensure that they have adequate procedures in place to prevent and or discover acts of bribery and corruption. The Bribery Act allows for a defence in circumstances where the company can show it had adequate procedures in place to minimise the risk of bribery.

The Company Directors, Senior Managers, and all Employees of the Company carry a responsibility to ensure adherence to the policy as failures to do so will, apart from potential legal sanctions, seriously threaten the ability of the Company to pre-qualify, tender, and win contracts and consequently jeopardise the continuing success or existence of the Company.

3.2 Risk Assessment

Soil Engineering Geoservices Limited will assess the risks posed to the company in a changing marketplace to assess the nature and extent of potential bribery risk. Such risk assessments shall be carried out by appropriately qualified employees, properly documented and updated as necessary.

3.3 Guidance and Training

The Code of Ethics and Conduct, Anti-Corruption Code of Conduct and The Group Code of Ethics (Code's) has been developed for Soil Engineering Geoservices Limited employees to ensure they are conversant with bribery related issues and how it may impact on their job role at Soil Engineering Geoservices Limited. In that respect, the Code's explain what is permitted and not permitted in sufficient detail, to enable employees to find answers to specific practical questions, or to know who they should approach for guidance.

Soil Engineering Geoservices Limited will also provide appropriate anti-bribery education and training to all employees through a variety of means, including mandatory E-Learning.

Soil Engineering Geoservices Limited mandate compulsory E-Learning in connection with Competition Law, Conflict of Interests and Anti-Corruption by all salaried staff.

3.4 Annual Ethics & Compliance Audit

The Annual Ethics & Compliance Audit consists of senior individuals from both Soil Engineering Geoservices Limited and Group undertaking a risk based audit of the adherence to the Code of Ethics and Conduct, Anti-Corruption Code of Conduct and The Group Code of Ethics.

The annual Ethics & Compliance Audit gives ensures compliance with Anti-Bribery Policy and the associated Bribery Prevention processes and procedures as detailed in the Code's. This function is independent of operational activities, as far as reasonably practical.

3.5 Objectives

In order to monitor the effectiveness and achieve continuous improvement of the Policy, Code's and other related policies and procedures, Soil Engineering Geoservices Limited will establish a number of anti-bribery objectives at relevant and appropriate functions within the organisation.

The objectives will be reviewed on an annual basis and will include the following standard objectives/ targets, with progress against each communicated to the Board:

Annual review of Code's, Policy and Risk Analyses;

Annual Ethics & Compliance Audit;

Target 100% anti-bribery training for new employees;

Target zero dismissals relating to bribery;

Target zero prosecutions relating to bribery.

3.6 Updates

Soil Engineering Geoservices Limited will remain abreast of key developments in this area of law and ensure the Policy, Code's and training is updated in a timely manner.

3.7 Reporting bribery related concerns

Soil Engineering Geoservices Limited divisional management will report promptly to Soil Engineering Geoservices Limited Board any infringement of the Bribery Act, or reasonable suspicion of an infringement.

Employees having a concern about any bribery related matter should raise the issue with their line manager or a board Director.

If employees continue to have concerns and / or feel that they are unable to raise an issue in this way they should raise the matter using the 'Protect' helpline.

Tel: 020 3117 2520

Web: <https://protect-advice.org.uk/>

The Advice Line is open: Mondays, Tuesdays, Thursdays: 9:30am – 1pm, 2pm – 5:30pm; Wednesdays and Fridays: 9:30am – 1pm.

all calls are taken by 'Protect', an independent organisation with impartial staff trained to handle these types of calls.