

Anti-Bribery & Corruption Policy

The Bribery Act 2010 has updated and enhanced UK law on bribery including foreign bribery and is now among the strictest legislation internationally on bribery. It applies not only to UK companies, but also to persons associated with the Company, to their operations and agents abroad and foreign companies operating in the UK. There are four types of offences under the Bribery Act, that of:

- Bribing another person
- Being bribed
- Bribing foreign public officials, and
- Failure of commercial organisations to prevent bribery

Ashtead Technology strictly prohibits the offering, the giving, the solicitation or the acceptance of any bribe, whether in cash or any other form of inducement **to and from** any person or Company **by** any individual employee, agent or another person or body acting on Ashtead Technology's behalf in order to gain any personal or commercial, contractual or regulatory advantage for Ashtead Technology or for any other purpose.

This policy applies to all employees (permanent and temporary), contractors, visitors and agents working with Ashtead Technology in any capacity for any project, duration, at any facility, location or as a representative of the Company.

All employees and others acting for, or on behalf of, Ashtead Technology are encouraged to report any suspected bribery in accordance with the procedures set out in the anti-bribery policy. The Company will support any individuals who make such a report, provided that it is made in good faith.

Violations of this policy will result in the Police being informed and a full investigation by the Company which may lead to disciplinary action up to and including dismissal. Bribery is a criminal offence that may result in imprisonment, an unlimited fine for the individual and an unlimited fine for the Company.

This policy forms part of the terms and conditions of employment for all employees and will be explained upon commencement of employment and the policy is made available on the Company's SharePoint site.

All employees, contractors and agents working with Ashtead Technology are required to undertake annual compliance training on Anti-Bribery and Corruption to ensure full knowledge and understanding and to maintain ongoing adherence to the policy.

Approved on behalf of the Board of Directors of Ashtead Technology.



Allan Pirie
Chief Executive Officer