

Bribery Act 2010

CJ (Corruption) Act 2018

Anti-Bribery & Corruption

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Signed by:
James Conroy, Director

Purpose

The purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery and corruption legislation, and to ensure that Conroy's business is conducted in an honest, ethical, and socially responsible manner.

Policy Statement

Bribery is the offering, promising, giving, accepting, or soliciting of an advantage as an inducement for action which is illegal or a breach of trust. A bribe is an inducement or reward offered, promised, or provided in order to gain any commercial, contractual, regulatory, or personal advantage.

It is Conroy's policy to conduct all business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption in every aspect of our operations, across all sectors and jurisdictions in which we work. We are committed to acting professionally, fairly, and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems to counter bribery.

We will uphold all laws relevant to countering bribery and corruption, including the **Criminal Justice (Corruption Offences) Act 2018** (Ireland) and the **Bribery Act 2010** (United Kingdom). Under the 2018 Act, a body corporate may be found guilty of a corruption offence if any person connected with the company commits such an offence, with a potential penalty of an unlimited fine. It is a defence for the company to prove that it took all reasonable steps and exercised all due diligence to prevent the offence. This policy, and the systems and controls which support it, form part of that due diligence.

Scope

This policy applies to all individuals working at all levels, including directors, employees (whether permanent, fixed-term, or temporary), consultants, contractors, subcontractors, trainees, agency staff, and any other person associated with Conroy or working on our behalf. "Third party" means any individual or organisation encountered during the course of work, including clients, suppliers, agents, advisers, and government or public bodies. This policy covers bribes, gifts and hospitality, facilitation payments, political contributions, and charitable contributions.

What Is Not Acceptable

Employees and associated persons must not engage in any form of bribery, either directly or through any third party. Specifically:

- No employee shall offer, promise, give, request, or accept a bribe or any other form of improper inducement.
- No employee shall offer or give any gift or hospitality which could be regarded as illegal or improper, or which violates the recipient's own policies.
- Facilitation payments must not be made. Irish law does not distinguish facilitation payments from corrupt payments, and any such payment may constitute a criminal offence. In the rare event that a payment is unavoidable due to a genuine and immediate risk to personal safety, the amount must be kept to a minimum, recorded in full, and reported to a Director immediately.
- No political donations shall be made, whether in cash or kind, in support of any political party or candidate, as this can be perceived as an attempt to gain an improper business advantage.
- Charitable contributions are encouraged but must not be used to conceal bribery. All charitable donations require prior approval from a Director and must be publicly disclosable.

Gifts and Hospitality

We recognise that the practice of giving and receiving business gifts varies between countries and sectors. The test to be applied is whether the gift or hospitality is reasonable, proportionate, and justifiable in all the circumstances, and whether the intention behind it is transparent. Gifts or hospitality must never be offered or accepted where there is any suggestion that a return favour will be expected. Gifts in cash must never be accepted. All gifts and hospitality offered or received must be declared and recorded in a register maintained by the Directors.

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Your Responsibilities

All employees are required to read, understand, and comply with this policy. The prevention, detection, and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. Any employee who believes or suspects that a conflict with or breach of this policy has occurred, or may occur, must notify a Director as soon as possible. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve the right to terminate contractual relationships with other workers or subcontractors who breach this policy.

Raising Concerns and Protection

Employees and associated persons are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage, by contacting a Director or by emailing info@conroy.ie. Conroy is committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential offence has taken place. We will support anyone who raises genuine concerns, even if they turn out to be mistaken. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern.

Record-Keeping

We must keep financial records and have appropriate internal controls in place which evidence the business reason for making payments to third parties. All accounts, invoices, and other documents relating to dealings with third parties must be prepared and maintained with strict accuracy and completeness. No accounts must be kept off-book to facilitate or conceal improper payments.

Monitoring and Review

The Directors have overall responsibility for ensuring this policy complies with our legal and ethical obligations and that all those under our control comply with it. This policy is reviewed annually by the Directors and amended as necessary. All employees receive training on this policy as part of their induction, and our zero-tolerance approach is communicated to all suppliers, contractors, and business partners at the outset of our business relationship. Internal control systems and procedures are subject to regular review to provide assurance that they are effective in countering bribery and corruption.