

ANTI BRIBERY AND CORRUPTION CODE OF CONDUCT

This Anti-Bribery and Corruption Code of Conduct applies to MDM Timber Ltd (“the Company”).

Principle and Prohibition of Corruption

The Company adopts a strict zero-tolerance approach to corruption. It is the policy of the Company to prohibit all forms of corruption, whether direct or indirect, in any part of its operations or business relationships. Corruption includes bribery, facilitation payments, kickbacks, fraud, abuse of position, and any other improper conduct intended to secure an unfair business advantage.

This Code applies to all employees, officers, contractors, and any person acting on behalf of the Company. The Company also expects its suppliers, agents, and business partners to adhere to the same standards.

No employee, officer, contractor, or person acting on behalf of the Company shall offer, give, request, or accept any bribe or other improper inducement. This prohibition applies equally to dealings with public officials, private individuals, and commercial entities.

Rationale for Prohibiting Corruption

The prohibition of corruption is essential to ensure compliance with applicable laws and to uphold the Company’s commitment to integrity and ethical conduct. Corruption exposes the Company and individuals to serious legal penalties, including fines and imprisonment, and can cause significant reputational harm. It undermines fair competition, distorts decision-making, and erodes trust among stakeholders. By preventing corruption, the Company protects its financial stability, maintains its credibility, and contributes to a fair and transparent business environment.

Organisational Commitment

The Company is committed to conducting its business and affairs honestly, fairly, and with integrity. It does not engage in, tolerate, or facilitate any form of corruption under any circumstances. The Company maintains effective systems of internal control designed to prevent, detect, and respond to corrupt practices.

Howard Chase, Pippis Hill, Basildon, Essex SS14 3BE
Tel: 01268 530550 sales@mdmtimber.co.uk www.mdmtimber.co.uk

Managing Director: M.D Cheriton
Directors: K.J. Fuller, M.J. Allum, P.G. Allum
Chairman M J Allum
Registered in England No 2348881 VAT No 507 5208 63



Appropriate due diligence is conducted before engaging third parties, and ongoing monitoring is carried out to ensure compliance with this Code. The Company provides employees with training and guidance to support their understanding of anti-corruption obligations and encourages the reporting of any concerns in good faith. All allegations of corruption are taken seriously, investigated promptly, and addressed with appropriate disciplinary or legal action where necessary.

Standards of Conduct

All employees and representatives are required to act with honesty and integrity at all times and to avoid any activity that could give rise to corruption or the appearance of corruption. Gifts and hospitality may only be offered or accepted where they are reasonable, proportionate, and for legitimate business purposes, and must not influence, or appear to influence, business decisions. Cash or cash equivalents must never be offered or accepted.

Facilitation payments are strictly prohibited, regardless of local custom or practice. All business dealings must be conducted transparently and accurately recorded in the Company's books and records. False, misleading, or incomplete entries are not permitted under any circumstances.

Employees must avoid conflicts of interest and must disclose any situation in which personal interests could improperly influence their professional judgment. The use of third parties to carry out acts that would be prohibited if performed directly is not permitted.

Procedures and Controls

The Company maintains clear and practical procedures to support this Code. All financial transactions must be properly authorised, supported by appropriate documentation, and recorded in reasonable detail. Procurement and tendering processes must be conducted fairly, transparently, and based on objective criteria.

Before entering relationships with agents, consultants, or other intermediaries, appropriate due diligence must be undertaken to assess integrity and corruption risk. Payments to third parties must be proportionate, commercially justified, and made through legitimate and traceable channels.

Employees are required to report any suspicion or instance of corruption promptly through the appropriate internal reporting channels. Reports will be handled confidentially and without retaliation against those who raise concerns in good faith.

Concerns should be reported to: Mark Cheriton

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Blackmail and Extortion

The Company recognises that employees may, in rare circumstances, be subjected to blackmail or extortion. In such situations, employees must not comply with any demand for payment or other improper advantage, except where there is an immediate and credible threat to personal safety.

The safety of individuals is paramount. If a threat is present, the employee should take all reasonable steps to remove themselves from danger and seek assistance. As soon as it is safe to do so, the employee must report the incident in full, providing all relevant details including the nature of the demand, the individuals involved, and the circumstances in which it arose.

The Company will provide appropriate support to the individual concerned and will take all necessary steps to address the situation, including involving law enforcement authorities where appropriate. Any payment made under duress to protect life or safety must be reported immediately and accurately recorded.

Reporting and Enforcement

All employees have a duty to report suspected or actual breaches of this Code. The Company is committed to ensuring that no individual suffers retaliation for raising concerns in good faith or for refusing to engage in corrupt conduct.

Breaches of this Code will be treated as serious disciplinary matters and may result in dismissal, termination of contracts, and referral to law enforcement authorities where appropriate.

Review

This Code will be reviewed annually to ensure that it remains effective, relevant, and aligned with legal and regulatory requirements.

Reviewed 20th April 2026

Next review 20th April 2027

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