



Anti-Bribery and Fraud Policy Statement

It is the policy of Ancon Limited to conduct all its business in an honest and ethical manner. The Company takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships wherever it operates, and will implement and enforce effective systems to counter bribery. The reputation of Ancon for lawful responsible business is of paramount importance and is one of its most prized assets. This policy is intended to provide a coherent and consistent framework to enable all connected with the Company to understand and then do everything necessary to act properly, and for those outside the Company to be able to appreciate how seriously the Company takes its responsibilities to operate in a fully legal and compliant fashion.

The Company will uphold in all its dealings all relevant laws to prevent and counter bribery, corruption and fraud in all the jurisdictions in which it operates, including the Bribery Act 2010. This policy expands on the principles of the anti-bribery, corruption and fraud statements set out in our parent company CRH's Code of Business Conduct.

The Bribery Act has changed and clarified the law on bribery. It sets out clear rules about already existing offences of giving or receiving a bribe and introduces a new offence of bribing a foreign public official. All these offences could be committed by an individual. The Act also creates a new offence which could be committed by the Company of failing to prevent bribery by someone connected with the Company, and it is particularly because of this new aspect of the law that this new policy has been introduced. The Company recognises that the building industry in general has a poor compliance record and this fact reinforces the Company's desire to ensure that it does not engage in or facilitate any form of bribery or corruption.

Under this policy you are required to act honestly and with integrity at all times to safeguard the Company's resources and reputation. In addition you must comply with the spirit as well as the letter of all laws and regulations of countries in which the Company operates or hopes to operate. You must also respect the Company's customers, suppliers, neighbours and other parties with whom you come into contact, to ensure that the Company is able to pursue its business objectives in an ethical, lawful, considerate as well as professional manner.

Signed

A handwritten signature in black ink, appearing to read "Stuart Maxwell". The signature is written in a cursive, flowing style.

Stuart Maxwell, Managing Director

Date 20 July 2011