



Anti-Corruption & Bribery Policy

The only acceptable reasons for giving and receiving gifts and hospitality are to build and reinforce relationships with our customers and suppliers in relation to our business objectives and to provide our usual service whilst doing business with them.

If gifts and hospitality are abused, then the following risks may exist:

- Conflict of interest – to obtain a personal benefit
- Bribery – in return for a favourable business decision
- Distrust – receiving or giving excessive gifts could undermine trust in our Company
- Unfairness – we do not want to treat our customers and suppliers unfairly
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In summary, it is not appropriate to give, promise or offer a payment, gift or hospitality with the expectation or hope that a business advantage to be received.

During the Christmas period, we receive gift from our suppliers, potential suppliers and clients. All these gifts are put into a raffle for employees. If you are given a gift during the Christmas period, please ensure that you inform your Manager so that it can be dealt with appropriately.

If you are offered any gifts or hospitality, then you must inform your Manager immediately (see above for gifts received at Christmas). Your Manager will then decide if it is appropriate for you to accept the gift or hospitality that is being offered. (it is fine to accept gifts with nominal value, such as pens etc)

Bribery:

A bribe is an inducement of a reward offered, promised or provided to gain any commercial, contractual regulatory or personal advantage. In the UK it is an offence to:

- Offer, promise or give a financial or other advantage to another person (i.e. bribe a person) either in the UK or abroad with the intention of inducing or rewarding improper conduct
- Request, agree to receive or accept a financial or other advantage (i.e. receive a bribe) for or in relation to improper conduct
- Bribe a foreign official

Version 1: January 2019: Revision Date: January 2020: Mr AA Lane

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- You can be personally liable for any such offence. Therefore, all employee must comply with any anti-bribery and anti-corruption legislation, act honestly, responsibly and with integrity and safeguard and uphold the Company's reputation by operating in an ethical, professional and lawful manner at all times.

Bribery of any kind is strictly prohibited. You are specifically instructed not to take a monetary bribe or any other form of bribe by any supplier or customer or official. You must inform a Director immediately if this happens.

You are specifically instructed not to offer bribes to others in respect of contracts potentially being awarded to us.

Failure to follow our strict instructions on the above may lead to disciplinary action being taken and the outcome may be summary dismissal.

You must inform your Manager or a Director if you have any suspicions that any of your colleagues may be involved in bribery or corruption. We will support anyone who raises genuine concerns in good faith under this policy even if they turn out to be mistaken. We are also committed to ensuring that no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption



Andrew A Lane
Managing Director
1st January 2019

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