

ANTI - BRIBERY AND CORRUPTION POLICY

This document sets out the rules of the Company in relation to anti-bribery and corruption matters in the United Kingdom. It is illegal to offer, promise, give, request, agree, receive or accept bribes and we do not tolerate them.

It is Company policy that all of its business dealing will be honest and apply the best of business ethics. Therefore it proactively forbids its staff or representatives, from engaging in activities that are considered to be Bribery or Corruption, in the interests of furthering the needs of the business or for the benefit of individuals representing or acting on behalf of the business.

Compliance with the Company's policy in relation to bribery and corruption is regarded as part of your conditions of employment. If any employee fails for any reason to follow the rules set out in this Document this may result in disciplinary action being taken, up to and including dismissal.

Bribery & Corruption Definition

Bribery is the offer or receipt of any gift, loan, payment, reward or other advantage to or from any person as an encouragement to do something which is dishonest, illegal or a breach of trust, in the conduct of the Company's business.

Corruption is the misuse of entrusted power for private gain.

The law

To place this in context, employees and workers should be aware that if they engage in activities which are contrary to UK anti-bribery and corruption legislation, they could face up to 10 years in prison and/or an unlimited fine, and the Company could also be liable to an unlimited fine and Government sanction.

Examples of Bribery and Corruption

This policy document is not regarded as exhaustive, but does give specific examples of situations and sets out the rules and procedures and which should be followed.

If employees or workers are at any time uncertain as to whether their actions will comply with this policy, they must seek guidance from the Managing Director.

Employees should at all times act in accordance with the following provisions:-

- behave honestly, be trustworthy and
- use the resources of the Company in the best interests of the Company and

do not misuse those resources;

- make a clear distinction between the interests of the Company and private interests to avoid any conflict of interest, and if such conflict does arise you should report it to the Managing Director immediately;
- ensure that any community support, sponsorship and charitable donations do not constitute bribery, and if in doubt you should consult the Managing Director;
- confidentially report all incidents, risks and issues which are contrary to this policy document to the Managing Director;
- raise any issues regarding anti-bribery and corruption laws and the Company's policies. Queries will be dealt with anonymously and a written response will be issued;

Employees & workers must not offer or accept bribes.

The Government does not intend that genuine hospitality or similar business expenditure that is reasonable and proportionate be caught by the Act, so the Company can continue to provide bona fide hospitality, promotional or other business expenditure at a proportionate level.

Do not, without express prior written approval from the Managing Director, offer or accept any gifts or hospitality to or from clients, contractors, suppliers, other third parties or public officials unless they are in the context of a hosted business event, and are under the value of £60 per event, per individual.

- Gifts are presents such as flowers, vouchers, food and drink. Event and travel tickets given to you as an individual are also gifts when they are not to be used in a hosted business context.
- Hospitality includes invitations to hosted meals, receptions and events for business purposes.

Employees & workers must not offer money to any public officials in order to speed up service or gain improper advantage. This type of bribery is a 'facilitation payment' and is illegal. If faced with a demand for a facilitation payment employees & workers must:

1. actively resist the payment; and
2. inform the Managing Director.

Training

The organisation will provide training in Anti-Bribery to anyone who could be exposed to bribery and/or corruption.

The UK anti-bribery and corruption legislation applies to all activities of a UK-based business no matter where they are carried out in the world. This policy therefore applies to ALL activities worldwide, whatever the local law, practice or custom may be.

By complying with this policy document we aim to ensure that you and the Company will not at any time knowingly breach any relevant anti-bribery and corruption legislation and also that by adhering to the Policy the Company can demonstrate that it has adequate procedures in place to prevent such activity.

You have an independent obligation to prevent bribery and corruption in the Company and to ensure that any interaction with public officials complies with this policy document and relevant laws.

As the law is constantly changing, this policy and the risks of bribery are subject to yearly review, and the Company reserves the right to amend this policy without prior notice.

Signed



Warren Lynes
Managing Director

Date: 24 April 2023