



**Director: Keith Ginn**

**Signed:** *K Ginn*

**Date: 4<sup>th</sup> January 2023**

**Next Review: 3<sup>rd</sup> January 2024**

## **Anti-Bribery Policy for the Offering and Acceptance of Bribes**

We have formulated this Policy in accordance with the requirements of the Bribery Act 2010 and are assisted with compliance issues from our Consultants AA Safety Solutions Ltd who engage qualified practitioners to advise and assist. Potential acts of bribery, corruption or anti-competitive behaviour reported to us would be investigated at Director level and dealt with accordingly.

We value our reputation for responsible behaviour and for executing it business in an ethical and professional manner. It recognises that bribery undermines democracy and the rule of law and poses very serious threats to sustained economic progress and that involvement in bribery will ultimately reflect adversely on its image and reputation.

Our aim therefore is to limit exposure to bribery by:

- Defining a clear anti-bribery policy as set out below
- Educating and training all employees through the use of presentations and seminars so that they can recognise and avoid all involvement in the act of bribery
- Encouraging individuals to be vigilant and to report any suspicion of bribery, providing employees with suitable channels of communication and ensuring sensitive information is dealt with in the strictest confidence
- Rigorously investigating instances of alleged bribery and assisting the police and other appropriate authorities
- Taking firm and vigorous action against any individual(s) involved in bribery

### **The Policy**

We prohibit the offering, the giving, the solicitation or the acceptance of any bribe, whether cash or other enticement to or from any person or company, wherever they are located and whether they are a public official or body or private person or company by any individual employee, agent or other person or body acting on our behalf in order to gain any commercial, contractual or regulatory advantage for the company in a way which is unethical or in order to gain any personal advantage, financial or otherwise, for the individual or anyone connected with the individual.

## **Further Clarification**

We recognise that our business varies across the markets in which it does business and what is normal and acceptable in one place may not be in another. This policy prohibits any inducement which results in a personal gain or advantage to the recipient or any person or body associated with them, and which is intended to influence them to take action which may not be solely in the interests of the company or of the person or body employing them or whom they represent.

Our Anti-Bribery Policy is not designed to prohibit the following practices providing they are customary, are proportionate and are properly recorded:

- normal and appropriate bona fide hospitality providing it is reasonable and proportionate
- the giving of a ceremonial gift on a festival or at another special time such as Christmas
- the offer of resources to assist the person or body to make the decision more efficiently provided that they are supplied for that purpose only

If any individual is in doubt as to whether a potential act constitutes bribery, the matter should be referred to the employee's senior manager before proceeding.

## **Employee Responsibility**

The prevention, detection and reporting of bribery is the responsibility of all employees throughout the company employees can report any suspicion of bribery in confidence by contacting their line manager.