

Bribery Act Policy

The purpose of this policy is to provide support to employees whose position or role/responsibility could mean they fall foul of Bribery legislation. It may mean that the role requires that they procure/purchase or tender for contracts or sell, negotiate deals that are beneficial to one party over and above another.

There are 4 possible offences under the act:

- Bribing another person
- Being bribed
- Bribing a foreign Public Official
- Failing to prevent bribery

The company has undergone a risk assessment and the outcome has indicated that the company may benefit from having a dedicated policy in place.

You are reminded that:

Employees are forbidden to accept gratuities, gifts, loans or other benefits from the Company's customers or suppliers without the express written permission of their Director/Senior Manager. In addition, employees are not permitted to make use of any services or be supplied with goods on a personal basis from any customer or supplier of goods and services or employee of any customer or supplier of goods and services to the company because of the possible conflict of interest unless full disclosure has been made and prior written permission obtained from a Director/Senior Manager. Should any such conduct come to the attention of the Company the Company reserves the right to treat this as gross misconduct for which employment may be terminated without notice or payment in lieu.

BRIBERY: The offering, giving, promising accepting or soliciting of money gifts loans or other advantage as an inducement to do something that is illegal OR a breach of trust in the course of carrying out your organisations activities.

This procedure forms part of the employee's contract of employment.

In summary our policy provides for:

- Guidance in the event gratuities, gifts or loans are offered to staff.
- Guidance in the event staff offer or are offered goods or services as inducement for business.

RESPONSIBILITIES

The Company is responsible for creating an environment, which is fair and transparent, to all.

Managers have a responsibility to address any allegation or issue as quickly as possible and take the appropriate action. Management will, make assessments of risk, deal with decisions where potential for bribery exists and receive and investigate reports of bribery. Managers also have a responsibility to keep accurate records of discussions and agreed actions during tender or purchase procedures or where gratuities have been offered.

Employees have a responsibility for their own actions in regard to gifts and performance and continued development to meet new challenges at work. Employees are also responsible for

bringing any problem to the attention of their Manager that may have an effect on them personally or the company.

HOSPITALITY

In relation to occasions on which hospitality is offered or accepted by employees' issues may arise as to the line between a proper public relations exercise and intention to induce improper performance of a relevant function.

It is not unlawful to promote or market the company to improve the image of the company, or to establish cordial and professional relationships or to maintain them, providing it is reasonable and proportional.

In order to make an assessment of any particular hospitality event, which is to be offered to a client or prospective client, the Managing Director will have to be supplied with information. This will include the cost and nature of the hospitality, the name and details of the person to be entertained and the purpose of the event. She/he will be required to approve the event or make suggestions for modifying it.

The following is a list of examples of unacceptable behaviour:

- Taking a customer or supplier for a working lunch at a restaurant whose prices would be considered extravagant under normal circumstances. These include:
 - Members of a customer's family at a working lunch or dinner
 - Providing alcohol with the meal that is excessive or extravagant
 - Running special offers or promotions that involve benefits that are not for use by a customer or their employees in their business
 - Paying for a customer to go to an event that is not work-related or without the permission of their employer
- Similar examples apply where the hospitality is being extended to the employee.

TENDERING

In relation to awarding of contracts for services the company has provisions for competitive tendering in place. However, as an additional requirement and as a requirement in awarding contracts, which are not required to go out to tender, an issue of bribery might arise.

CHARITABLE DONATIONS

In relation to charitable and political donations care should be exercised to avoid the suggestion of soliciting favours.

EXPENSES

Expense forms and expense should be submitted to accounts in the normal way however must clearly detail the customer's name and company name for any business entertaining.

The receipt must be the original receipt detailing what has been purchased and not the debit/credit card receipt.

Expenses will not be paid if this information is missing.

PROCEDURE

In order to prevent behaviour which might unwittingly give rise to the suspicion of bribery and to prevent any associated person purporting to act on its behalf in a manner that brings suspicion on the company or its employees, the following measures have been adopted as appropriate and proportionate to the risks it faces

It is important that EVERYONE address concerns and report any attempt at bribery that comes to their attention, whether it consists of a direct approach to him or herself or an act done by an associated third party. In the first instance report this directly to Paul Eagleton; do not wait. The aim of this approach is to try to resolve any problems quickly and informally with a view to resolving the matter before it becomes a serious issue.

Under no circumstances will a person who reports a suspicion of bribery be subject to victimisation for making a bon fide report, whether or not the suspicion turns out to be justified.

MANAGEMENT SUPPORT

- Bring concerns regarding performance to the attention of the employee
- Undertake any necessary investigation as to the allegations
- Review the employee's roles & responsibilities
- Re-affirm the standards that are expected by the Company
- Provide any necessary training (internal or external)
- Record in writing any actions taken, confirm the outcome in writing to the employee and retain a copy on the employees personnel file

RIGHT TO BE ACCOMPANIED

In the event an allegation of bribery is made, employees have the right to be accompanied at any disciplinary stages of this procedure by a single companion who is either: -

- a) A work colleague; or,
- b) A full-time official employed by a trade union; or a lay official, so long as they have been certified in writing by their union as having experience of, or as having received training in, acting as a worker's companion at disciplinary or grievance meetings.

The Bribery Act 2010 does not require external verification of any anti-bribery prevention measures we may put in place, however the company will keep this policy under review and make amendments to it as appropriate and in the light of any further guidance issued.

What are the penalties for committing an offence?

The offences of bribing another person, being bribed and bribing a foreign public official are punishable on indictment either by an unlimited fine, imprisonment of up to ten years or both. Both a company and its directors could be subject to criminal penalties.

The new offence of failure to prevent bribery is punishable on indictment by an unlimited fine.

Businesses that have been convicted of corruption could find themselves permanently debarred from tendering for public-sector contracts. Your business may also be damaged by adverse publicity if it is prosecuted for an offence

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Neil Mackey
Managing Director
12th August 2026