



Policy statement

The directors are opposed to bribery, corruption & fraud in whatever form it may take.

The directors do not believe that it is appropriate for employees to accept gifts from customers, suppliers or any other person or organisation with which the company has (or might have) commercial relations. It is important that no employee acts in any way that conflicts with the policy.

A breach of the policy, following investigation, will be regarded as a disciplinary offence and might result in dismissal.

Inducements

For the purposes of influencing a decision or achieving an outcome, employees shall not:

- Offer or give any payments, gifts or inducements

Exceptions may relate to gifts &/or entertainment if they are of modest value. The agreement must be obtained from a manager before consideration is being made.

Receipt of gifts – disclosure

Employees must not accept gifts, money or entertainment from third party organisations or individuals where these might reasonably be considered likely to influence a decision.

The recipient is required to return the gift to the sender, with a polite note thanking him/her and explaining that it is the company's policy on gifts.

Exceptions may relate to items of modest value, where the employee must ensure that their manager is made aware of the item. The manager may allow the employee to accept the gift, taking account of its purpose eg. a token of gratitude for work carried out to a particularly high standard. Not disclosing modest gifts breaches the policy.

This policy does not apply to promotional gifts, i.e. items such as stationery or pens that bear the logo or company name of another organisation, provided that these have no significant value. However, since it is likely that such gifts will be received by only a limited number of employees, they should be shared amongst other members of staff where appropriate.

Fraudulent acts

The directors do not accept fraud. Such acts are considered to be: deceit, trickery, sharp practice, or breach of confidence, carried out for profit or to gain some unfair or dishonest advantage. An example of such an act might be the alteration of paperwork or work data.

Who must comply with this policy?

This policy applies to all persons working for, or on behalf, of the company.

Who is responsible for this policy?

The directors have overall responsibility for ensuring that this policy complies with the legal obligations, and that employees and associates comply with it. The policy will be reviewed annually, with intermediate reviews which may become necessary.



Neil Bray

Managing Director

1st January 2024