



OUR COMMITMENT

This policy statement forms part of our overall management systems

This policy sets out our standards and underpins the behaviours we expect from everyone engaged by us when conducting business on our behalf. We strive to ensure we build and maintain the first class reputation that our customers, employees and suppliers expect of us.

Responsibilities: The responsibility for implementing and determining company policies is derived by the Board of Directors. David Elliott has been appointed as having overall responsibility for this policy.

Definition: Bribery is the accepting of gifts, money, hospitality or other favours in return for providing something of value to the briber. The purpose of this policy is to set out rules that must be adhered, to ensure that no bribery occurs.

Unacceptable Behaviour: Accepting, requesting or offering any financial or other reward from any person in return for providing some favour must not occur in any circumstances.

Business Gifts: From time to time, customers, suppliers or other persons may offer a gift. This could be a small item or something of considerable value. All gifts, however small must be reported to the appropriate Senior Line Manager and recorded. No gift with a nominal value of more than £20.00 may be accepted. If a gift is offered and refused due to value, this must be reported to an appropriate Senior Line Manager.

Hospitality: From time to time, customers, suppliers or other persons may invite an employee to a hospitality event. All invitations must be reported to an appropriate Senior Line Manager. Permission must be granted prior to any acceptance of such invitations.

Offering Gifts and Hospitality: It's our custom to offer small gifts (eg pens, mugs) to customers, suppliers and other persons. If a gift is authorised the employee is then permitted to give to the appropriate individuals. All gifts are to be recorded. We occasionally run hospitality events, primarily aimed at thanking customers and suppliers for their custom and loyalty. Employees are not permitted to organise any additional hospitality events without seeking prior approval.

Responsibilities of Senior Line Managers: Senior Line Managers are responsible for keeping a record of all gifts and hospitality invitations that are offered and/or received. Should any concerns arise about any actions they should contact the Managing Director immediately.

Expenses: Senior Line Managers must authorise all expense claims from employees. They have a responsibility and are expected to check and sign all claim forms against receipts. Any items of expenditure that give rise for concern should be fully investigated.

Attempts to Bribe: Any employee who is concerned that he/she is potentially being bribed should report this matter to their Senior Line Manager immediately.

Donations: We make regular donations to various charities. Employees are permitted to make further donations without prior permission from the Finance Director.

Disciplinary Action: Any employee found to have offered or accepted a bribe will face disciplinary action which could include dismissal for gross misconduct.

Raising Concerns: If an employee is concerned that acts of bribery are occurring they should inform their Senior Line Manager in the first instance. If this course of action is inappropriate they are to inform another Senior Manager.

Communication of Policy: This policy is communicated to all employees and is made available to any interested party.

Policy Review: This policy statement will be reviewed on an annual basis and amended where appropriate.

David Elliott
Managing Director
June 2016