

Anti-corruption and bribery policy

POLICY STATEMENT

- 1.1 It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery and corruption.
- 1.2 We will uphold all laws relevant to countering bribery and corruption. However, we remain bound by UK laws, including the Bribery Act 2010, in respect of our conduct both at home and abroad.
- 1.3 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. Any non-employee who breaches this policy may have their contract terminated with immediate effect.
- 1.4 This policy does not form part of any employee's contract of employment and we may amend it at any time. It will be reviewed regularly.

1. WHO MUST COMPLY WITH THIS POLICY?

2. This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

3. WHAT IS BRIBERY?

- 1.5 **Bribe** means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit.
- 1.6 **Bribery** includes offering, promising, giving, accepting or seeking a bribe.
- 1.7 All forms of bribery are strictly prohibited. If you are unsure about whether a particular act constitutes bribery, raise it with your manager.
- 1.8 Specifically, you must not:
 4. give or offer any payment, gift, hospitality or other benefit in the expectation that a business advantage will be received in return, or to reward any business received;
 5. accept any offer from a third party that you know or suspect is made with the expectation that we will provide a business advantage for them or anyone else or

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6. give or offer any payment (sometimes called a facilitation payment) to a government official in any country to facilitate or speed up a routine or necessary procedure.

1.9 You must not threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.

7. GIFTS AND HOSPITALITY

1.10 This policy does not prohibit the giving or accepting of reasonable and appropriate hospitality for legitimate purposes such as building relationships, maintaining our image or reputation, or marketing our products and services.

1.11 Any gifts or hospitality invitations from customers or suppliers (either current or prospective) must not be accepted without the prior permission of the Managing Director.

1.12 Where permission has been granted in respect of an hospitality event, all attendance arrangements must be made through the Company. The making of arrangements on a private basis is strictly prohibited.

1.13 Promotional gifts of low value such as branded stationery to or from existing customers, suppliers and business partners will usually be acceptable.

8. RECORD-KEEPING

1.14 You must declare and keep a written record of all hospitality or gifts given or received.

1.15 All accounts, invoices, and other records relating to dealings with third parties including suppliers and customers should be prepared with strict accuracy and completeness. Accounts must not be kept "off-book" to facilitate or conceal improper payments.

9. HOW TO RAISE A CONCERN

10. If you are offered a bribe, or are asked to make one, or if you suspect that any bribery, corruption or other breach of this policy has occurred or may occur, you must notify the Chairman and Managing Director as soon as possible.

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