



ANTI-BRIBERY AND CORRUPTION POLICY

Stuart Hingley Building Services Ltd is committed to the highest standards of ethical conduct and integrity in its business activities in the UK and overseas. This policy sets out Stuart Hingley Building Services Ltd's position on preventing and prohibiting bribery and corruption in accordance with the Bribery Act 2010 ('The Act').

The Act came into force on 1st July 2011 and created a framework of five criminal offences.

- Giving, promising, and offering a bribe
- Agreeing to receive or accept a bribe
- Bribing a foreign official
- Failure of commercial organisations to prevent bribery
- A senior officer of a commercial organisation consenting to or conniving in an act of bribery

The Act can be viewed using the following link:

<http://www.legislation.gov.uk/ukpga/2010/23/contents>

Policy Objective

Stuart Hingley Building Services Ltd's Anti Bribery and Corruption Policy ('the Policy') sets out the key Anti-Bribery and Corruption principles which Stuart Hingley Building Services Ltd is committed to.

Policy Scope

All Stuart Hingley Building Services Ltd's employees, contractors and suppliers must comply with the Policy. The policy extends to Stuart Hingley Building Services Ltd having proportional procedures to ensure that all service providers (including contractors and suppliers) comply with Stuart Hingley Building Services Ltd's anti bribery and corruption policies. It is essential that Stuart Hingley Building Services Ltd conduct an effective process of due diligence prior to entering into significant relationships and that we keep a record of this process.

Any breach of the Policy is likely to constitute a serious disciplinary, contractual and criminal matter for the individual concerned and may cause serious damage to the reputation and standing of Stuart Hingley Building Services Ltd.

Stuart Hingley Building Services Ltd does not tolerate, permit, or engage in bribery, corruption, or improper payments of any kind in our business dealings, anywhere in the world, both with public officials and people in the private sector. Ethical behaviour is in the long-term interests of our company.

Stuart Hingley Building Services Ltd is committed to the following key Anti Bribery and Corruption principles:

- We will carry out business fairly, honestly and openly
- We will not give or offer any money, gift, hospitality or other advantage to any person carrying out a business or public role, or to a third party associated with that person, to get them to do something improper.
- We will not give or offer any money, gift, hospitality or other advantages to any foreign public official with the intention of influencing them to our business advantage



Stuart Hingley Building Services Ltd

- We will not use intermediaries or contractors for the purpose of committing acts of bribery
- We do not allow employees to accept money, gifts, hospitality and other advantages from business associates, actual or potential suppliers, or service providers which are intended to influence a business decision or transaction in some improper way
- Any employee found to be in breach of these principles will face disciplinary action
- No employee will suffer demotion, penalty, or other adverse consequence for refusing to pay bribes, even if it may result in Stuart Hingley Building Services Ltd losing business
- We will avoid doing business with others who do not commit to conducting business without bribery
- We are committed to a programme to counter the risk of Stuart Hingley Building Services Ltd becoming involved in bribery. We will have adequate procedures in place to ensure that all employees understand the implications of the Act and our procedures. We will have appropriate mechanisms in place to record any problems.

Any concerns in relation to a breach of the Policy should be reported in one of the following ways.

- Your Line Manager
- Director of HR
- A Confidential and Anonymous Whistleblowing helpline.

Implementation, Monitoring and Compliance

Stuart Hingley Building Services Ltd will conduct risk assessments across its business on a regular basis and where relevant will identify employees or officers of Stuart Hingley Building Services Ltd who are in positions where they may be exposed to bribery.

Further information and training on the Act and what it means for Stuart Hingley Building Services Ltd will be issued to those bribery risk areas identified in the risk assessment. This training will be mandatory for those individuals identified in these risk areas.

Further information and guidance

This policy sets out the key principles which Stuart Hingley Building Services Ltd must adhere to. Further relevant information and guidance about this policy can be found in the UK Ministry of Justice website:

<http://www.justice.gov/guidance/making-and-reviewing-the-law/bribery.htm>

Name: Stuart Hingley

Signed:

Position: Director

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