

# ANTI BRIBERY POLICY



## Introduction

The Company is committed to implementing and enforcing effective systems to counter bribery. Therefore, it is the policy of Pat Munro (Alness) Ltd to conduct all aspects of its business in an honest and ethical manner at all times. This policy applies to all individuals working for the Company, including anyone providing services to the Company such as consultants, or contractors.

## Policy Aim

The aim of this policy is to help the Company act in accordance with the Bribery Act 2010 maintain the highest possible standards of business practice and advise individuals of the companies 'zero-tolerance' to bribery.

## Policy Statement

The company will not:

- Make contributions of any kind with the purpose of gaining any commercial advantage.
- Provide gifts or hospitality with the intention of persuading anyone to act improperly or to influence a public official in the performance of their duties.
- Make, or accept, "kickbacks" of any kind.

The company will:

- Keep appropriate internal records that will evidence the business reason for making any payments to third parties.
- Encourage employees to raise concerns about any issue or suspicion of malpractice at the earliest possible stage.
- See that anyone raising a concern about bribery will not suffer any detriment as a result, even if they turn out to be mistaken.

## Definitions

**Bribe** is a financial or other advantage offered or given to anyone to persuade them to or reward them for performing their duties improperly or with the intention of influencing them in the performance of their duties.

**Hospitality** is the practice of being hospitable this includes the reception and entertainment of guests and visitors. This policy does not prohibit giving and receiving promotional gifts of low value or normal and appropriate hospitality.

**Kickbacks** or facilitation payments are typically small payments made in return for a business favour or advantage.

## Employee Responsibility

It is the responsibility of all employees to prevent and report conduct which has taken place which you suspect is a bribe (or corrupt). Any such incidents can be reported to a Manager or by using the procedure set out in the companies Whistle Blowing Policy.

## Non-Compliance

### Staff

Failing to observe Company policy may lead to disciplinary action in accordance with the Company's Disciplinary Policy.

### Visitors

In the event of a breach of the policy by other organisations, or individuals, the Company will take appropriate action.

Approved:

**Brian Munro**  
**Managing Director**

Date: 11<sup>th</sup> January 2022

Signed:

A handwritten signature in blue ink, appearing to read 'Brian Munro', written over a light blue horizontal line.