



ANTI-BRIBERY POLICY STATEMENT

The Bribery Act 2010

The Act, very generally, is defined as giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for having already done so.

Calcot Asbestos Recruitment Limited Anti- Bribery policy is mandatory for all Calcot Asbestos Recruitment Limited's employees, agents, consultants, sub -contractors and suppliers.

Any act of bribery, in whatever form is unacceptable to this company. We will consider taking disciplinary action against anyone who fails to comply with the anti-bribery policy up to and including dismissal.

The following is absolutely prohibited under this policy:-

- Making unofficial payments to officials in order to obtain any permission which wouldn't otherwise be granted
- Appointing any third party or supplier who you know or have good reason to believe, has engaged in any corrupt or unlawful conduct or offences under the Act.
- Paying a third party for the purpose of being a 'fixer' to open doors etc.
- Company employees must never offer, pay, solicit or accept bribes in any form, including facilitation payments.

Employees may accept low value token gifts such as branded pens, stationery and mouse mats produced for the purpose of being given away, if given by an existing supplier. Occasional boxes of confectionary etc. may be given to a department as opposed to an individual. Otherwise employees must refuse personal gifts such as Christmas, wedding or birthday gifts, including vouchers or cash equivalents received from any third party.

Calcot Asbestos Recruitment Limited employees may occasionally receive invitations from suppliers or others to corporate hospitality or entertainment events. Hospitality or entertainment may only be accepted if:-

- Employees or personnel from the supplier are in attendance
- The supplier does not pay for any accommodation or travel expenses (unless very trivial)
- The entertainment and /or acceptance of it could not be interpreted as a reward, inducement or encouragement for a favour or preferential treatment
- It is not unduly lavish or extravagant.

The company does not make contributions or donations to political organisations or independent candidates nor incur any political expenditure but respects the right of individuals to make personal contributions, provided they are not made in any way to obtain advantage in a business transaction.



Calcot Asbestos Recruitment Limited conducts business with the highest standards of honesty and integrity and any employee concerned about any malpractice, improper action, or wrongdoing is strongly encouraged to report the matter, in the first instance, to their Line Manager/Supervisor. If an employee feels unable to raise the issue with their Line Manager/Supervisor for whatever reason, they should contact the Managing Director.