



1.500	<b>Bribery and Corruption Policy</b>		
Issued by: Health, Safety & Quality Officer		Effective Date: 25/01/2023	Rev. M Pg. 1 of 2
Approved: 25/01/2023 13:31 - Richard Parfitt, Operations Director			

Even an allegation of bribery or corruption can seriously damage our reputation.

We refuse to offer, give or receive bribes or improper payments, or participate in any kind of corrupt activity, either directly or through any third party.

Bribery is offering, providing or receiving something of value – including cash, gifts, hospitality or entertainment – as an inducement or reward for something improper. Usually, but not always, it's to obtain or retain business or some other illegitimate advantage.

Whether they are provided to or received from public officials or private individuals, bribes are against the law and against our code, no matter what "local custom" may be.

Corruption involves any of these activities: bribery, extortion, fraud, deception, collusion, cartels, abuse of power, embezzlement and money laundering.

### Our Principle

We will not offer, give or receive bribes, or make or accept improper payments to obtain new business retain existing business, affect the outcome of works that we are undertaking or secure any improper advantage, and we won't use or permit others to do such things for us.

### We Always

Make efforts to ensure that the company are trading both fairly and ethically, looking beyond economic objectives to consider the wider implications of our business decisions.

Seek to avoid even the appearance of wrongdoing. Even an allegation of bribery or corruption can seriously damage the company's reputation.

Report any attempts to bribe us, or to solicit bribes from us, and any suspicions we have about bribery and corruption.

### We Never

Participate in any form of corrupt behaviour.

Conceal or fail to record accurately and completely the true nature of our activities or falsify or tamper with the company's books and records.

Pay more than fair market value for goods and services.



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## Gifts and Hospitality

We make sure gifts or hospitality at work are reasonable, and we never offer or accept them if it may improperly influence a business decision or impair independence or judgement.

Gifts and hospitality Invitations to social functions, sporting events, meals and entertainment, gifts of low value, small or customary tokens of appreciation to foster goodwill or enhance business relationships, employees may occasionally receive or offer any of these things in connection with our business.

## What We Mean

Any gifts or hospitality we receive or give in connection with our business should always be customary and reasonable in terms of value and frequency. Use your judgement and good sense. In principle, there is nothing wrong with genuine relationship-building gifts or hospitality. Just the appearance of impropriety can be damaging.

## We Always

Check with our operating company legal or compliance contact before offering any kind of gift or hospitality to public officials. Generally such things are best avoided.

Check before offering customers any kind of gift or invitation.

## We Never

Offer or accept gifts or hospitality, if we think they might impair objective judgement, improperly influence a decision or create a sense of obligation, or if there's a risk they could be misconstrued or misinterpreted by others.

Solicit gifts or hospitality.

Offer or accept gifts of cash or cash equivalent (e.g. vouchers).

## We Will

In the event of any breach this Policy will be contacted.

Signed For and on behalf of Adien Limited



Richard Parfitt  
Managing Director

20<sup>th</sup> January 2023

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