



JFS

Joseph Flach & Sons

ANTI BRIBERY AND CORRUPTION POLICY

We have an established policy of conducting our business with integrity, and without the use of corrupt practices or acts of bribery, to obtain an unfair/unethical advantage. We comply with both the spirit and letter of the law, and maintain our reputation for fair dealing with third parties. We purchase and provide goods/services based on quality, service and business needs.

This policy applies to our employees and our suppliers and contractors. It's purpose is to maintain our reputation and protect our employees, and should avoid any misinterpretation or misunderstanding. It is also designed to ensure that employees do not find themselves in a potentially vulnerable position.

Fraud

Employees, suppliers and contractors shall not employ or participate in dishonest methods or schemes for the purpose of obtaining personal or business advantage or reward, including methods involving fraud, deceit and any action that does not comply with legislation.

Bribes and Kickbacks

The law prohibits the payment of any bribes, kickbacks or other illicit forms of payment. Employees, suppliers and contractors must not commit an act with the purpose of inducing a person to act improperly, or be in receipt of gifts, gratuities, entertainment or other favours for themselves, or immediate family, which may be interpreted as inducing them to act improperly. Employees, suppliers and contractors shall not in any way offer, give, solicit or receive any bribes, kickbacks or other illegal or improper payments, transfers or receipts.

Employees, suppliers and contractors are not permitted to bribe another person or company, by giving or offering financial or other advantage, to gain or reward the improper exercise of an organisational activity. A gift to a third party may be interpreted as a bribe. The only exception are gifts of a trifling nature and value, or hospitality authorised by Management. If an employee is in breach of this rule, it will not be authorised through expenses and therefore not reimbursed.

Conflicts of Interest

The best way to ensure that employees, suppliers and contractors will not find themselves in a position that they are perceived to have taken a bribe, or otherwise acted inappropriately, is to look at the areas where they may have conflicts of interest, e.g. doing a favourable deal for a friend/relative to the disadvantage of the employer.

It is the responsibility of employees to put the interests of the Company before their own personal interests. Therefore, if an employee believes there may be a conflict of interest, they should consider formally declaring this to their Manager or a Director. Depending on the circumstances, it may be appropriate to remove themselves from the situation.

Receipt of Business Gifts

Employees, suppliers and contractors are not permitted to accept or solicit any gifts, money, services or other inducements for personal gain, or the gain of family or friends. The only exception to this is a gift of small value, which does not exceed £50.



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All business gifts should be declared to their Manager, and a discussion should take place as to whether it is appropriate for them to accept. If it is decided that the gift was given for work or service of a very high standard, and the gift is proportional to the amount of work/service involved, the recipient will/may be allowed to keep the gift.

Entertainment (Corporate)

Employees, suppliers and contractors may accept invitations to working lunches and modest/occasional meals with someone with whom we do business. Industry functions such as award ceremonies or annual lunches or dinners can also be a useful way of networking. Invitations to other social occasions can only be accepted if they serve a practical purpose.

If an employee, supplier or contractor is offered the opportunity to attend a corporate entertainment function, e.g. sporting/cultural occasion of any sort, by a business contact, they should disclose this information. If considered inappropriate, and could be perceived as an inducement or bribe, it will need to be explained why the invitation is being declined.

If their Manager is unsure on whether to allow attendance at an event, then they should inform a Director, who will decide whether it is appropriate to accept such an offer.

If an employee, supplier or contractor is permitted to attend corporate hospitality/entertainment events, then they are expected to conduct themselves in a professional manner, so as not to bring the Company into disrepute. They are advised to show restraint and avoid getting themselves involved in activities/conduct that may be deemed unsuitable/inappropriate by the Company or others.

Expenditure should be reasonable and normally authorised in advance. All entertainment should be suitably appropriate and conducted by the employees, suppliers or contractors in a professional manner.

Invoices and/or business receipts relating to entertaining must have details of who was being entertained and who they work for.

Implementation

Decisions as to what is acceptable may not always be easy. If anyone is in doubt as to whether a potential act constitutes bribery or corruption, the matter should be referred to a Director for guidance before proceeding. The prevention, detection and reporting of bribery and/or corruption is the responsibility of all employees, suppliers and contractors. The whistle-blowing policy is there to confidentially report any suspicion of bribery or corruption.

Document Control

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