



27 Rollesby Road, Hardwick Industrial Estate, King's Lynn, Norfolk, PE30 4LS

Company Reference No. 07157993

Anti-Bribery and Corruption Policy

In Accordance with the Bribery Act 2010

Issued on the 3rd January 2024

Review Date 2nd January 2025

1. Introduction

Advance Engineering (UK) Ltd values its reputation and is committed to maintaining the highest level of ethical standards in the conduct of its business affairs.

The actions and conduct of the Advance Engineering (UK) Ltd employees as well as others acting on the company's behalf is key to maintaining these standards.

The purpose of this document is to set out Advance Engineering (UK) Ltd policy in relation to bribery & corruption. The policy applies strictly to all directors, managers, employees, agents, consultants, contractors and to any other people or bodies associated with the Advance Engineering (UK) Ltd.

2. Understanding and recognizing bribery and corruption

Acts of bribery or corruption are designed to influence an individual in the performance of their duty and incline them to act in a way that a reasonable person would consider to be dishonest in the circumstances. Bribery can be defined as offering, promising, or giving a financial (or other) advantage to another person with the intention of inducing or rewarding that person to act or for having acted in a way which reasonable person would consider improper in the circumstances.

Corruption is a form of abuse of entrusted power for private gain and may include but is not limited to bribery. Bribes are not always a matter of handing over cash. Gifts, hospitality, and entertainment can be bribes if they are intended to influence a decision.

3. Penalties

The Bribery Act 2010 came into force on 1 July 2011, under the Act, bribery by individuals is punishable by up to ten years' imprisonment and/or an unlimited fine.

If the firm is found to have taken part in the bribery or is found to lack adequate procedures to prevent bribery, it too could also face an unlimited fine.

A conviction for a bribery or corruption related offence would have severe reputational and/or financial consequences for the firm.

4. Advance Engineering (UK) Ltd will not tolerate bribery or corruption in any form.

The firm prohibits the offering, giving, solicitation or the acceptance of any bribe or corrupt inducement, whether in cash or in any other form: to or from any person or company wherever located, whether a public official or public body, a private person or company; by any individual employee, director, agent, consultant, contractor or other person or body acting on the firm's behalf; in order to gain any commercial, contractual, or regulatory advantage for the firm in any way which is unethical or to gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.

This policy is not intended to prohibit the following practices provided they are appropriate, proportionate and are properly recorded:

- a) Normal hospitality
- b) Fast tracking a process which is available to all on the payment of a fee
- c) Providing resources to assist a person or body to make a decision more efficiently, provided that it is for this purpose only

It may not always be a simple matter to determine whether a possible course of action is appropriate.

If you are in any doubt as to whether a possible act might be in breach of this policy or the law, the matter should be referred to Mr R High.

Advance Engineering (UK) Ltd will investigate thoroughly any actual or suspected breach of this policy, or the spirit of this policy.

Employees found to be in breach of this policy may be subject to disciplinary action which may ultimately result in their dismissal.

5. Key risk areas

Below are the key areas you should be aware of in particular:

- a) Excessive gifts, entertainment, and hospitality: can be used to exert improper influence on decision makers.
- b) Gifts, entertainment, and hospitality are acceptable provided they are not deemed to be outside normal behavior.
- c) Reciprocal agreements: or any other forms of 'quid pro quo' are never acceptable unless they are legitimate business arrangements which are properly documented and approved by the directors
- d) Improper payments to obtain new business retain existing business or secure any improper advantage should never be accepted or made
- e) Actions by third parties for which the firm may be held responsible: car agents, contractors, and consultants, acting on the firm's behalf.
- f) Appropriate due diligence should be undertaken before a third party is engaged. Third parties should only be engaged where there is a clear business rationale for doing so, with an appropriate contract. Any payments to third parties should be properly authorized and recorded.
- g) Record keeping can be exploited to conceal bribes or corrupt practices

Advance Engineering (UK) Ltd will ensure that we have robust controls in place so that our records are accurate and transparent.

6. Monitoring and Review

All members of our employees are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

Advance Engineering (UK) Ltd will monitor the effectiveness and review the implementation of this policy, considering its suitability, adequacy, and effectiveness.

- a) Under the Public Interest Disclosure Act 1998, a worker includes those on agency contracts and consultants contracted to work for someone.
- b) All employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions, and queries should be addressed to Mr R High Managing Director of Advance Engineering (UK) Ltd
- c) This policy will be amended from time to time and notification will be provided by way of toolbox talks and memorandums to the management team.

7. Employee responsibility and how to raise a concern

'The prevention, detection and reporting of bribery or corruption is the responsibility of all employees throughout the firm.

If you become aware or suspect that an activity or conduct which is proposed or has taken place is a bribe or corrupt, then you have a duty to report this.

Any such incidents should be reported directly to the Managing Director Mr R High.

Mr R High



Managing Director

3rd January 2024

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Advance Engineering (UK) Ltd