

ANTI BRIBERY AND CORRUPTION POLICY STATEMENT

Introduction

BP Installations Ltd (the Company) is committed to conducting business ethically and with integrity to ensure that business can be conducted in a free and fair market. Every individual and organisation that acts on the Company's behalf or represents the Company is responsible for ensuring that this principle is upheld and the policy is implemented so that the Company conducts all business in an honest and professional manner in line with The Bribery Act 2010.

Scope

This policy applies to employees, workers or any individual or organisation that conducts Company business or represents the Company in any capacity.

Bribery

The Company has a zero tolerance policy towards any form of bribery, whether this bribery takes the form of a direct or indirect financial payment or other reward or advantage to encourage an individual or organisation to perform their functions or activities improperly or as a reward for having already performed their functions or activities improperly.

Any individual or organisation acting on behalf of the Company is strictly prohibited from offering, promising, giving, requesting, agreeing to receive or accepting any bribes or backhanders. Any breach of this policy by an employee will be treated as gross misconduct and may result in their summary dismissal. Any breach of this policy by a third party or sub-contractor acting for the Company will result in an immediate termination of their contractual arrangements.

Employees and other individuals or organisations acting for the Company should be aware that bribery is a criminal offence which may result in up to 10 years' imprisonment and an unlimited fine for both the individual and Company.

Entertainment, Hospitality, Gifts, Promotional Expenditure

The Company permits the use of entertainment, hospitality, gifts or promotional expenditure where it is used to thank or build relationships with its clients, suppliers, customers or other organisations providing that it is arranged in good faith and not organised with the intention of influencing the impartiality of the individual or organisation.

It is absolutely essential that the use of entertainment, hospitality, gifts or promotional expenditure is reasonable and proportionate. To ensure that expenditure is reasonable and proportionate, all individuals conducting Company business or representing the Company are subject to a cap of £50 per recipient. Any expenditure over this threshold must be requested in writing to the Managing Director prior to the expenditure being made detailing the purpose and nature of the expenditure, the recipient and the objective. The Managing Director will approve any proposals which demonstrate a clear business objective and are appropriate for the business relationship.

In order to ensure transparency when conducting business hospitality, entertainment or giving or receiving gifts, it is essential that accurate, detailed and up to date records are kept. The Company reserves the right to make adverse inferences from a lack of accurate, detailed or up to date records which cannot be adequately explained and furthermore, these inferences may result in disciplinary action being taken (should it be appropriate) after a full investigation has taken place.

Inducements

As a general rule the Company finds it acceptable for its staff to receive small gifts from grateful clients, suppliers etc. However the Company does not condone under any circumstances any inducements leading to corruption, bribery or behaviour detrimental to the business or its reputation.

Any individual who is given a gift from an existing or potential client, customer, supplier etc. must inform the Managing Director to ensure that an assessment can be made as to the intentions behind the giving of the gift.

If the gift has been given with the statement that it is a gesture of goodwill and appreciation and is not of substantial value, the individual may be permitted, at the Company's discretion to keep the gift or to share it with colleagues. However if it is felt that the gift may constitute a bribe or there may be a conflict of interest the individual will be asked to return the gift to the sender advising them of the Company's policy relating to gifts and request that this is respected.

If the purpose of the gift is unclear, or there is a suspicion that it has been given with the intention of influencing the Company's decision in some way and/or there is a conflict of interest and/or it appears to be of excessive value, the individual will be asked to return the gift to the sender advising them of the Company's policy relating to gifts and request that this is respected.

Any employee found to have accepted gifts without the appropriate authorisation will be liable to disciplinary action. Deliberate taking of bribes will be treated as an act of gross misconduct.

Any third party or sub-contractor acting for the Company found to have accepted gifts without the appropriate authorisation may have their contractual arrangements terminated.

Notification of Concerns

If you become aware of any conduct which you believe may be in breach of this policy and/or the associated policies and procedures you should raise your concerns immediately with the Managing Director, under the Public Interest Disclosure and Whistle Blowing procedure. Whilst you should report any concerns, the following in particular should be reported:

- Any suspected or actual attempts to bribe or provide backhanders;
- Any requests for unusual payments and/or cash payments;
- Unusual or unsubstantiated expenses;
- Failure to follow normal financial practices, such as a lack of appropriate invoices;
- Business relationships with close family members, personal friends etc.
- Business activities in countries or with individuals who have a history of corruption.

In line with the Public Interest Disclosure and Whistle Blowing procedure, if you report your concerns in good faith you will be supported and will not be subjected to any detriment as a result of raising your concerns. Failure to raise your concerns will be considered a breach of trust and dealt with under the disciplinary procedure. Should any employee raise concerns which are subsequently found to be in any way malicious this will be dealt with under the Company's disciplinary process and may be treated as an act of gross misconduct.

Monitoring and Review

The Company appreciates that the risk of bribery may change over the course of time and therefore the Managing Director will take responsibility for reviewing this policy and its implementation on a regular basis.

For and on behalf of

 bpinstallations

Brendan Payne (Director)

Date: 20 January 2022