

POLICY STATEMENT

The Bribery Act 2010 makes it an offence to offer, promise or give a bribe. It is also an offence to request, agree to receive or accept a bribe.

A bribe is “a financial or other advantage offered or requested with the intention of inducing or rewarding improper performance of a relevant function or activity”. It also applies where you “know or believe that acceptance would constitute improper performance of a function or activity”.

It is our policy to conduct our activities in an open, honest and transparent way. We do not condone the use of corrupt practices or acts of bribery to obtain an unfair advantage. We adhere to the highest ethical standards and this is reflected in every aspect of the way in which we operate.

You must be alert to attempts to influence you inappropriately or to engage in/facilitate bribery. This is especially relevant to those procuring goods or services or dealing with third parties on our behalf.

For instance, you may be offered excessive hospitality or gifts to facilitate business dealings. If you are unsure about when and what levels of hospitality are acceptable, check first with your line manager.

You must not seek or accept any inducement designed to influence you inappropriately in the performance of your role.

Do not seek or accept money, gifts or other rewards. This applies to clients, customers, suppliers or any other person or organisation with whom we do (or might develop) business. This avoids any misunderstandings or allegations of impropriety. It is important you do not act inconsistently with our standards or, however inadvertently, impugn our integrity. Accepting a gift which influences or seems to influence your actions or decisions on our behalf may do this.

You may accept small, genuine tokens of appreciation or gratitude which are commensurate with common practice in our organisation. They must be proportionate, reasonable and of limited monetary value. You must always declare them to your line manager. You must not treat the person/organisation that provides such gift more favourably than our other clients/suppliers, etc.

Where you are unsure, or feel refusal of a gift or hospitality might cause difficulty, consult your line manager first. Similarly, consult your manager if you are at all unsure about a business gift or hospitality you intend to offer.

This policy does not apply to promotional items such as stationery or pens with a logo or company name. This is always provided the items have no significant monetary value.

We are committed to this policy and take a "zero tolerance" approach to any act of bribery or corruption by a member of staff. We view breaches as serious misconduct which, following investigation, may lead to disciplinary action. The penalty may include summary dismissal if we believe your action amounted to gross misconduct.

Signed



Date: 07 January 2023

John Solomi
Chairman
HSL Group Limited

Signed



Date: 07 January 2023

Paul Solomi
Managing Director
HSL Group Limited

