



COMPANY POLICIES

ANTI-BRIBERY & CORRUPTION

ANTI-BRIBERY & CORRUPTION POLICY

The Specialist Electrical Group Ltd is committed to the highest standards of ethical conduct and integrity in its business activities in the UK. This policy sets out The Specialist Electrical Group Ltd position on preventing and prohibiting bribery and corruption in accordance with the Bribery Act 2010 ('The Act').

The Act came into force on 1st July 2011 and created a framework of five criminal offences -

- Giving, promising, and offering a bribe.
- Agreeing to receive or accept a bribe.
- Bribing a foreign official.
- Failure of commercial organisations to prevent briber.
- A senior officer of a commercial organisation consenting to or conniving in an act of bribery.
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The Act can be viewed using the following link -

<http://www.legislation.gov.uk/ukpga/2010/23/contents>

Policy Objective & Responsibilities

The Specialist Electrical Group Ltd Anti Bribery and Corruption Policy ('the Policy') sets out the key Anti- Bribery and Corruption Principles which aims to ensure that the company adheres to the applicable UK Laws, which also facilitates the principles of fair trading in the marketplace.

The Directors / Senior Management Team are nominated as the champions of this Policy and have the responsibility for communicating the Policy and overseeing its implementation, as per the principles raised in this Policy.

Policy Scope

The Specialist Electrical Group Ltd expects employees, contractors, and suppliers to comply with this Policy. To facilitate this, the company will communicate the Anti-Bribery and Corruption Policy and conduct an effective process of due diligence prior to entering any significant business relationship, and thereafter to keep a record of the process.

Any breach of the Policy is likely to constitute a serious disciplinary, contractual, and criminal matter for the individual/s concerned and may cause serious damage to the reputation and standing of The Specialist Electrical Group Ltd.

The Specialist Electrical Group Ltd does not tolerate, permit, or engage in bribery, corruption, or improper payments of any kind in our business dealings, anywhere in the world, both with public officials and people in the private sector. Ethical behaviour is in the long-term interests of our company.

The Specialist Electrical Group Ltd is committed to the following key Anti Bribery and Corruption Principles -

- We will carry out business fairly, honestly, and openly.
- We will submit work proposals/quotations based on UK Fair Trading Principals.
- We will not give or offer any money, gift, hospitality, or other advantage to any person carrying out a business or public role, or to a third party associated with that person, to get them to do something improper.
- We will not give or offer any money, gift, hospitality, or other advantages to any homeland or foreign public official with the intention of influencing them to our business advantage.
- We will not use intermediaries or contractors for the purpose of committing acts of bribery.
- We do not allow employees to accept money, gifts, hospitality, and other advantages from business associates, actual or potential suppliers, or service providers which are intended to influence a business decision or transaction in some improper way.
- Any employee found to be in breach of these principles will face disciplinary action.
- No employee will suffer demotion, penalty, or other adverse consequence for refusing to pay bribes, even if it may result in The Specialist Electrical Group Ltd losing business.
- We will avoid doing business with others who do not commit to conducting business without bribery.
- We are committed to a programme to counter the risk of The Specialist Electrical Group Ltd becoming involved in bribery. We will have adequate procedures in place to ensure that all employees understand the implications of the Act and our procedures. We will have appropriate mechanisms in place to record any problems.

Any concerns in relation to a breach of the Policy should be reported in one of the following ways -

- Managing Director
- Your Line Manager
- A Confidential and Anonymous Whistleblowing helpline.

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Implementation, Monitoring and Compliance

The Specialist Electrical Group Ltd will conduct risk assessments across its business and as applicable will identify employees or others alike who are in positions where they may be exposed to bribery, and based on these findings implement applicable control measures and monitoring systems accordingly. Such control measures, systems will include –

- 1.Our Anti-Bribery and Corruption Policy will be signed and dated by our Managing Director and then posted on our company noticeboard; this then will be reviewed annually.
- 2.Employees will be made aware of Our Anti-Bribery and Corruption Policy by the delivery of Team Briefs/Toolbox Talks, these being delivered annually and signed for by our employees to acknowledge their understanding and acceptance of our Policy.
- 3.Our Policy will be further underpinned by the provision of information and training to employees who may be at a higher risk of exposure to bribery /corruption – as identified in our risk assessments. This training, and at relevant intervals refresher training, will be mandatory for those individuals identified as being in the higher risk of exposure category.
- 4.Within our business we will operate an employee Whistle Blowing Procedure, this to facilitate and identify instances of Bribery and Corruption.
- 5.At regular intervals, the Senior Management Team will audit the company's operations, this to again identify potential instances of Bribery, Corruption, and adherence to the Bribery Act 2010 ('The Act').
 - Where such evidence of Bribery and Corruption is identified this will be escalated accordingly and a full investigation carried out.
 - WhereBriberyandCorruptionisproven the company will furtherescalatetheirfindings to the relevant authorities as per the Bribery Act 2010 ('The Act').
- 6.New contractors / suppliers will undergo a process of due diligence prior to entering any significant business relationship, and thereafter records will be kept of the process; this will include evidence that the new contractors / suppliers have a robust Anti-Bribery and Corruption Policy and that they have adopted suitable procedures which demonstrate their adherence to the Bribery Act 2010 ('The Act').
- 7.With regards to our existing and new contractors and suppliers, our Anti-Bribery and Corruption Policy will be formally communicated to each, and as applicable they will be asked to sign a document which will record their acknowledgement of our Anti-Bribery and Corruption Policy - the Bribery Act 2010 ('The Act').
- 8.Annually our approved contractors / suppliers will undergo a process of vetting (PQQ), this will include evidence that our approved contractors / suppliers have maintained their adherence to the Bribery Act 2010 ('The Act') - Records will be kept of this process.

Further information and guidance

This policy sets out the key principles which The Specialist Electrical Group Ltd will adhere to. Further relevant information and guidance about this policy can be found in the UK Ministry of Justice website -

<http://www.justice.gov.uk/guidance/making-and-reviewing-the-law/bribery.htm>

Michael Simm & Russell Solts
Directors

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