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H SIVYER (Transport) Ltd

BRIBERY AND CORRUPTION GIFTS AND HOSPITALITY POLICY

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Signed:

Dated: 31st March 2022

All the information disclosed within this document is private and confidential and for internal use only.

BRIBERY AND CORRUPTION POLICY

This document sets out the rules of H Sivyer (Transport) Ltd in relation to anti-bribery and corruption matters in the United Kingdom.

Compliance with the Company's policy in relation to bribery and corruption is regarded as part of your contract of employment. If you fail for any reason to follow the rules set out in this document this may result in disciplinary action being taken against you which could result in your dismissal.

Bribery is the offer or receipt of any gift, loan, payment, reward or other advantage to or from any person as an encouragement to do something which is dishonest, illegal or a breach of trust, in the conduct of the Company's business.

Corruption is the misuse of entrusted power for private gain.

To place this in context, you should be aware that if you engage in activities which are contrary to UK anti-bribery and corruption legislation, you could face up to 10 years in prison and/or an unlimited fine, and the Company could also be liable to an unlimited fine and Government sanction.

This policy document is not regarded as exhaustive, but does give specific examples of situations and sets out the rules and procedures and which should be followed.

If you are at any time uncertain as to whether your actions will comply with this policy, you must seek guidance from the Commercial Manager or Managing Director.

You should at all times act in accordance with the following provisions:-

- behave honestly, be trustworthy and set a good example;
- use the resources of the Company in the best interests of the Company and do not misuse those resources;
- make a clear distinction between the interests of the Company and your private interests to avoid any conflict of interest, and if such conflict does arise you should report it to the Company Secretary immediately;
- ensure that any community support, sponsorship and charitable donations do not constitute bribery, and if in doubt you should consult the Company Secretary;
- confidentially report all incidents, risks and issues which are contrary to this policy document to the Company Secretary;
- raise any issues regarding anti-bribery and corruption laws and the Company's policies. Queries will be dealt with anonymously and a written response will be issued;
- do not offer or accept bribes.
- do not, without express prior written approval from the Finance Director or Managing Director, offer or accept any gifts or hospitality to or from clients, contractors, suppliers, other third parties or public officials.

- do not falsify company books and records.

The UK anti- bribery and corruption legislation applies to all activities of a UK-based business no matter where they are carried out in the world. This policy therefore applies to ALL activities worldwide, whatever the local law, practice or custom may be, this legislation also applies to company's dealings with government intermediaries.

By complying with this policy document, we aim to ensure that you and the Company will not at any time knowingly breach any relevant anti-bribery and corruption legislation and also that by adhering to the Policy the Company can demonstrate that it has adequate procedures in place to prevent such activity.

You have an independent obligation to prevent bribery and corruption in the Company and to ensure that any interaction with public officials complies with this policy document and relevant laws.

Giving gifts and hospitality

Staff may not, directly or through others, offer or give any, money, gift, hospitality or other valuables to an official, employee or representative of any supplier, customer or any other organisation, if doing so influences the organisation's relationship with the H Sivyver (Transport) Ltd.

Staff may:

- give gifts of a nominal value (H Sivyver (Transport) Ltd. advertising novelties);
- with management approval, provide meals and other entertainment provided that the expenses are kept at a reasonable level. For the avoidance of doubt, the per capital cost of a meal should not exceed £50 and would normally be much less;

Receiving gifts and hospitality

Any member of H Sivyver (Transport) Ltd (i.e. employees, agency staff, directors, connected person) should not, directly or through others, solicit or accept money, gifts, hospitality or any other valuables that could influence the relationship with that organisation or individual.

Gifts or hospitality may not be accepted, irrespective of value, which might influence or be seen to influence such situations as the outcome of the award of business (contract) or the use of the H Sivyver (Transport) Ltd. property or

other assets, or to benefit personally or for the benefit of any person connected to that person.

Unless you have been informed otherwise you may accept:

- a gift of nominal value, such as an advertising novelty, when it is customarily offered to others having a similar relationship with that individual or organisation;
- customary meals or entertainment provided that the expenses are kept at a reasonable level.

For the avoidance of doubt:

- gifts with a value of more than £25 and hospitality expected to cost in excess of £50 should be authorised by your line manager ;
- gifts or hospitality in excess of £50 should be authorised by Chief Executive of the company.

If in doubt an employee should discuss any potential conflict with his or her line manager.

If an excessive gift or hospitality is found to have been accepted, then your line manager will discuss the circumstances with you and agree how to deal with it. If excessive gift(s) or hospitality are accepted on more than one occasion or are found to have influenced decisions inappropriately, against H Sivyer (Transport) Ltd. policy (or potentially illegally), then appropriate disciplinary procedures will follow.

Review

This policy will be reviewed:

- a. Annually.
- b. Following a change in procedures.
- c. Following a change in legislation.
- d. If it is found to be inadequate
- e. If requested by the review board following a major concern.