McNealy Brown LIMITED

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SPECIALIST FABRICATORS • ARCHITECTURAL METALWORKERS • DESIGN & INSTALLATION ENGINEERS

Anti-Bribery Policy

Introduction

The Company values its reputation for ethical behaviour and strong moral principles. It recognises that over and above commission of any crime, and involvement in bribery will also reflect adversely on its image and reputation. Its aim is to limit its exposure to bribery by:

- Setting out a clear Anti-Bribery Policy
- Communicating this policy to employees
- Undertaking appropriate due diligence measures before engaging others to represent the Company in its business dealings
- Monitoring and reviewing the risks

Policy

The Company prohibits the offering, giving, solicitation or acceptance of any bribe (whether cash or an inducement):

- To or from any person or Company (Wherever they are situated and whether they are a public official, body, private person, or Company)
- By any individual employee, agent or other person, body acting on behalf of the Company
- To gain any commercial, contractual or regulatory advantage for the Company in a way that is unethical
- To gain personal advantage (monetary or otherwise) for the individual or anyone connected with the individual

This policy prohibits any inducement that results in a personal gain or advantage to the recipient or any person or body associated with them, which is intended to influence them to take action that may not be solely in the interests of the Company or of the person or body employing them or whom they represent.

This policy is not meant to prohibit normal and appropriate hospitality or the giving of a gift on a festival or at another special time, providing they are customary in a particular market, are proportionate and are properly recorded.

Inevitably, decisions as to what is acceptable may not always be straightforward. If you are in any doubt as to whether a potential act constitutes bribery, the matter should be referred to a Director before proceeding.

Signed: .....

Roland Brown
Director
23.02.2018

Signed: .....

Vaughan McNealy
Director
23.02.2018

ISOQAR REGISTERED UKAS MANAGEMENT SYSTEMS 0026

Certificate No.5044
ISO9001 - ISO14001
OHSAS18001 - BS EN 1090