McNealy Brown LIMITED

Units 14 - 17
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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:

- Producing a periodic and formal assessment of the risk of bribery within its organisation or that of its associated persons
- Top level commitment to the prevention of bribery
- Producing clear, practical, and accessible anti-bribery procedures proportionate to the risks identified
- Undertaking appropriate due diligence on its organisation to identify any corrupt practices
- Communicating this policy to employees
- Monitoring or periodically review the policy and procedures, particularly if conditions change

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: .....

Vaughan McNealy
Director
28.02.2022

Signed: .....

Roland Brown
Director
28.02.2022

Certificate No.5044
ISO 9001 - ISO 14001
ISO 45001 - BS EN 1090