



ANTI-BRIBERY AND CORRUPTION POLICY

Policy statement

1. It is the policy of 'The Reliable Spring & Mfg Co Ltd' (RSM), to conduct all of our business in an honest and ethical manner. We take a zero- tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery and corruption.
2. We require our employees, at all times to act honestly and with integrity. Employees are required to report any circumstances which are in breach of this policy. All reported incidences of actual, suspected, or attempted bribery or corruption will be promptly and thoroughly investigated and dealt with appropriately. All employees will be required to agree to abide by this policy as part of their contract.

Who does this policy apply to?

3. This policy applies to all persons working for RSM or on our behalf in any capacity, including employees at all levels.

About this policy

4. It is a criminal offence to offer, promise, give, request, or accept a bribe. As a business if we fail to prevent bribery, we can face an unlimited fine, exclusion from tendering for further work, and damage to our reputation. We therefore take our legal responsibilities very seriously.

What is bribery and corruption?

11. The Bribery Act 2010 aims to promote anti-bribery practices amongst businesses and came into force on 1 July 2011. An organisation will commit a criminal offence if it fails to prevent bribery that is intended to get or keep business or an advantage in the conduct of business for the organisation.
12. Bribery is offering, promising, giving, or accepting any financial or other advantage, to induce the recipient or any other person to act improperly in the performance of their functions, or to reward them for acting improperly, or where the recipient would act improperly by accepting the advantage.
13. An advantage includes money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or anything else of value.

14. A person acts improperly where they act illegally, unethically, or contrary to an expectation of good faith or impartiality, or where they abuse a position of trust. The improper acts may be in relation to business or professional activities in the course of employment, or other activities by or on behalf of any organisation of any kind.
15. Corruption is the abuse of entrusted power or position for private gain.
16. It is not acceptable for you (or someone on your behalf) to:
 - i. give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given.
 - ii. give or accept a gift or hospitality during any commercial negotiations or tender process, if this could be perceived as intended or likely to influence the outcome.
 - iii. accept a payment, gift or hospitality from a third party that you know, or suspect is offered with the expectation that we will provide a business advantage for them or anyone else in return.
 - iv. accept hospitality from a third party that is unduly lavish or extravagant under the circumstances.
 - vi. threaten or retaliate against another individual who has refused to commit a bribery offence or who has raised concerns under this policy; or engage in any other activity that might lead to a breach of this policy.
17. See also the sections on 'facilitation payments' and on 'gifts, hospitality and expenses' below.

Facilitation payments and kickbacks

19. We do not make, and will not accept, "facilitation payments" or "kickbacks" of any kind in the UK or overseas.
20. Facilitation payments, also known as "back-handers" or "grease payments", are typically small, unofficial payments made to secure or expedite a routine or necessary action. They are not common in the UK but are common in some other jurisdictions.
21. Kickbacks are typically payments made in return for a business favour or advantage.



22. You must avoid any activity that might lead to a facilitation payment or kickback being made or accepted by us or on our behalf, or that might suggest that such a payment will be made or accepted. If you are asked to make a payment on our behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt which details the reason for the payment. If you have any suspicions, concerns or queries regarding a payment, you should raise these with the Managing Director.

Gifts, hospitality and expenses

23. This policy allows reasonable and appropriate hospitality or entertainment given to or received from third parties, for the purposes of:
- i. establishing or maintaining good business relationships
 - ii. improving or maintaining our image or reputation; or
 - iii. marketing or presenting our products and/or services effectively.
24. Promotional gifts of low value such as branded stationery to or from existing customers, suppliers and business partners will usually be acceptable.
25. Reimbursing a third party's expenses or accepting an offer to reimburse our expenses (for example, the costs of attending a business meeting) would not usually amount to bribery. However, a payment in excess of genuine and reasonable business expenses (such as the cost of an extended hotel stay) is not acceptable.
26. We appreciate that practice varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift, hospitality or payment is reasonable and justifiable. The intention behind it should always be considered.
27. Employees must follow the employee Code of Conduct in declaring all gifts and hospitality whether or not those are accepted.

Donations

28. We do not make contributions to political parties.

Record-keeping

29. We must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.
30. You must declare and keep a written record of all hospitality, or gifts given or received, which will be subject to managerial review.

31. You must submit all expenses claims relating to hospitality, gifts or payments to third parties in accordance with our expenses policy and record the reason for expenditure.
32. All accounts, invoices, and other records relating to dealings with third parties including suppliers and customers should be prepared with strict accuracy and completeness. Accounts must not be kept "off-book" to facilitate or conceal improper payments.

Your responsibilities

33. You must ensure that you read, understand and comply with this policy.
34. The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

How to raise a concern

35. You must raise concerns about any issue or suspicion of bribery or corruption at the earliest possible stage.
36. If you are offered a bribe, or are asked to make one, or if you believe or suspect that any bribery, corruption or other breach of this policy has occurred or may occur, you must report it as soon as possible. Employees must report it to the Managing Director where the business interests of RSM are implicated also.
37. If you are unsure about whether a particular act constitutes bribery or corruption, raise it with the Managing Director or any appropriate member of the RSM senior leadership team as soon as possible.

Protection

38. Individuals who refuse to accept or offer a bribe, or who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.
39. We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Managing



Director immediately. If the matter is not remedied, you may raise it formally using our Grievance and Resolution Procedure.

Breaches of this policy

40. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
41. We will terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.