

Chapter House, Unit B
Riverside Way, Dartford
Kent DA1 5BS

Tel: 01322 278088 Fax: 01322 284556

email:

SLSL@straightlineservices.co.uk

accounts:

accounts@straightlineservices.co.uk

Anti-Bribery Policy

1. Application

This policy is sponsored by the Straight Line Services Board of Directors. It applies to all SLSL directors and employees whether permanent or temporary. It also applies to SLSL supply chain partners, including contractors and sub-contractors (together "Associated Persons").

2. Bribery

Directors, employees or Associated Persons of SLSL must not offer, provide, authorise, request or receive bribes or anything that could give the perception of a bribe.

The UK Bribery Act 2010 is brought specifically to your attention. It creates four main potential offences for UK registered companies:

- (1) A general offence of offering or giving bribes,
- (2) A general offence of receiving bribes,
- (3) A specific offence of bribing a foreign official, and
- (4) A "Corporate Offence", where a commercial organisation fails to prevent Associated Persons performing services on its behalf from committing bribery.

2.1 General offences of offering or giving bribes (1): or receiving bribes (2)

These offences are committed if a person (individual or company) offers, promises, gives or receives a bribe. A bribe can include money, or any offer, promise or gift of something of value or advantage. It need not necessarily be a large value. It might include signing bonuses or overpaying suppliers. It might also include intangible benefits such as the provision of information or advice or assistance in arranging a business transaction. It need not be for personal benefit. For example a donation by a supplier to a favourite charity could be a bribe.

2.2 Specific offence of bribing a Foreign Public Office (3)

Not applicable to SLSL scope of supply.

2.3 "Corporate Offence", where a commercial organisation fails to prevent Associated Persons performing services on its behalf from committing bribery (4)

This is a corporate offence. It is committed if a company fails to prevent persons (directors, employees, agency workers or Associated Persons) from using bribery with intention of obtaining or retaining a business advantage for the company. For this offence it is irrelevant whether or not the company approves, or is aware of, the bribery committed. It is, however, a defence to this corporate offence if the company can show that, despite a particular case of bribery, it nevertheless has 'adequate procedures' in place to prevent bribery but the burden of proof is on the company to demonstrate this.

3. Facilitation Payments

A “facilitation payment” is an unofficial payment (usually, but not necessarily, made to a public official) to encourage the recipient to perform their existing obligations or role, or to expedite or refrain from performing a routine task they are otherwise obliged to do. They are also known as gratuity or “grease” payments.

SLSL prohibits directors, employees and Associated Persons from offering, making or paying any “facilitation payments” to any third party.

All SLSL directors and employees must report any request by a third party for a facilitation payment.

4. Political Contributions

4.1 Political contributions by on behalf of or in the name of SLSL

SLSL funds and resources are not to be used to contribute to any political campaign, political party, political candidate or any of their affiliated organisations with the intention of obtaining business or any other advantage in the conduct of business SLSL will not use charitable donations as a substitute for political payments.

4.2 Personal political contributions by employees and other individuals

SLSL recognises that everyone has a right to participate as individuals in the political process and to make personal political contributions from personal funds and in their own time.

Directors, employees, agency workers or Associated Persons cannot, however, be reimbursed or otherwise compensated by SLSL for any such contribution.

5. Charitable Contributions and Sponsorship

SLSL and its directors, employees or Associated Persons may only make charitable contributions or sponsorships on behalf of or in the name of SLSL for bona fide charitable purposes and where the activities align with SLSL’s business objectives, values and ethical principles.

Charitable contributions or sponsorships should be given with the expectation that no tangible benefit is received or expected by SLSL. They should never be used as a substitute for political contributions.

6. Register of Charitable Contributions and Sponsorship

All donations and sponsorship made and requests for these and must be declared, and must state:-

- The name of the charity or individual receiving the donation/sponsorship
- The date that the donation/sponsorship was made
- The value of the donation/sponsorship

7. Gifts and Hospitality

Neither the law, nor this policy is intended to prohibit the giving or receipt of reasonable and proportionate hospitality designed to cement business relationships and enhance knowledge of people, products or services. More care is required when giving hospitality or entertainment to foreign public officials, because of the different definition of what constitutes an offence with regard to such persons (see section 2 above).

When consideration is being given to offering, accepting or providing gifts, hospitality or entertainment it must be ensured that they shall;

- Be in good faith, occasional, appropriate, reasonable and proportionate;
- Constitute a normal business courtesy (such as paying for a meal or shared taxi);
- Comply with any applicable laws, including those which may apply to any relevant foreign public officials;
- Not be possible of reasonably being perceived in any way as a bribe and;
- Not be in cash

By way of guidance;

- Customary gifts or modest Christmas gifts may be accepted provided the values of such gifts are modest and are not overly frequent from any one source;
- Reasonable entertainment in restaurants, theatres and at sporting or cultural events is allowed provided that it is not excessive and is not repeated on frequent occasions.

8. Associated Persons

SLSL will only contract with Associated Persons and engage with business partners who demonstrate at all times business integrity and who practice ethical conduct which meets the standards set out in this Policy and all applicable laws and regulations.

The Policy must be communicated to all Associated Persons at the outset of any business relationship with them and as appropriate thereafter. The standard letter included at the end of this Policy must be used.

9. Compliance Monitoring

Compliance with this policy by all directors, employees and all Associated Persons will be reviewed periodically.

10. Breaching the Anti-Bribery Laws and this Policy

There are severe penalties for breach of the UK Bribery Act; being an unlimited fine and/or imprisonment for up to 10 years. Also importantly, failure to comply with the new legislation may cause considerable damage to the good name and reputation of SLSL.

SLSL considers a breach of this Policy a serious offence. Any violation will result in the following:

10.1 Other employees and agency workers

Disciplinary action, up to and including dismissal of an individual in appropriate circumstances.

10.2 Suppliers, Contractors and Sub-Contractors

The business relationship with suppliers, contractors and/or sub-contractors who violate this Policy will be irrevocably terminated.

The police will be contacted if this policy is breached and the Directors deem it to be pertinent.

SLSL directors, employees and agency workers must therefore ensure that they are familiar with the content of this Policy and adhere to it at all times.

This policy is reviewed and updated at the beginning of each calendar year or as regulations and laws are revised.

RL Heming

RL Heming

Managing Director

Last Reviewed: 5th January 2023