



## **Anti Bribery and Corruption Policy**

East Kirkby Engineering Company Limited act to the highest personal, and ethical standards in everything we do. It means making sure all our actions and decisions support our values. A good reputation is a hard won asset which East Kirkby Engineering Co Ltd must protect.

Everyone must contribute in protecting and enhancing East Kirkby Engineering Co Ltd reputation by complying with this policy.

### **Introduction**

We wish to be a highly respected company in the industry, and that is dependent upon how we behave. It is also our policy to comply with the law.

It is a criminal offence to offer, request or accept a bribe. It is too an offence for a commercial organisation to fail to prevent an incident of bribery being committed either by the company or by someone associated with it in order to obtain or retain a business advantage.

This means that bribery and corruption have absolutely no place at East Kirkby Engineering Co Ltd – and why we operate a strict no tolerance policy towards bribery in all its forms whether directly or through third parties.

This anti-bribery and corruption policy applies to all staff, suppliers, manufacturers, subcontractors who supply services to us including agents.

### **Legislation**

The Bribery Act 2010 (the 'Act') reformed the criminal law providing a new, modern and comprehensive scheme of bribery offences that enable courts and prosecutors to respond more effectively to bribery at home or abroad.

Key elements of the Act:

1. two general criminal offences which cover the offering, promising or giving of an advantage, and requesting, agreeing to receive or accepting of an advantage
2. an offence of failure by a commercial organisation to prevent a bribe being paid for or on its behalf
3. You can find out more via <https://www.gov.uk/government/publications/bribery-act- 2010-guidance>.

## **Penalties for engaging in bribery and corruption**

The penalties for engaging in bribery or corruption are severe. Companies can face punitive fines and individuals can be fined and/or imprisoned.

Legislation incorporates a specific criminal offence for a company of failing to prevent bribery committed on its behalf. East Kirkby Engineering Co Ltd take this responsibility very seriously.

A conviction for a bribery or corruption related offence could have severe penalties for our reputation including exclusion from tender lists or being overlooked when bidding and loss of business, of which could have severe financial consequences for our business.

## **Preventing bribery**

East Kirkby Engineering Co Ltd will always:

1. Comply with this Anti-Bribery and Corruption Policy
2. Comply with company policies on gifts and hospitality, political contributions and charitable donations
3. Comply with our requirements concerning any conflicts of interest
4. Record all activities and transactions accurately, completely and transparently
5. Follow appropriate due diligence and risk mitigation procedures before proceeding with any contract or other arrangement
6. Seek advice if unsure how to proceed
7. Report any suspected or actual breaches of this policy promptly and accurately to the Commercial Director or immediate Supervisor/Manager

East Kirkby Engineering Co Ltd will never:

1. Participate in any form of corrupt behaviour
2. Use company funds, in the form of payments or gifts and hospitality for any unlawful, unethical or improper purpose
3. Authorise, make, tolerate or encourage, or invite or accept, any improper payments to obtain, retain or improve business
4. Permit anyone to offer or pay bribes or make facilitation payments on our behalf
5. Offer or accept gifts or hospitality, if we think this might impair objective judgement, improperly influence a decision or create a sense of obligation

## **Disciplinary action**

Bribery is a criminal offence which can lead to criminal penalties, but you have a duty to EKE, and any breaches of this policy will result in prompt disciplinary action, up to and including dismissal/termination of contract.

## **East Kirkby Engineering Co Ltd Statement of commitment**

East Kirkby Engineering Co Ltd will not tolerate any form of bribery or corruption.

## **Further information**

If you have any queries regarding this policy or wish to raise concerns, please contact Simon Foster (Commercial Director) [simon@ekeng.co.uk](mailto:simon@ekeng.co.uk).

Alternatively if you do not wish to be identified, please anonymously write to S. Foster at head office address.



Signed: John Gorenswaigh  
Director

Date: 21.02.20