

Ampsail Limited recognises that as it is continually placed in positions of trust by its clients and other parties, it has a responsibility to prevent and discourage bribery. With this, in mind, a clear policy detailing what the Company expects from all its employees has been put in place.

Bribery is an offer or receipt of any gift, loan, fee, reward or other advantage to or from any person as an inducement to do something that is dishonest, illegal or a breach of trust, in the conduct of the business.

The purpose of this policy is to set out the rules that must be adhered to by Ampsail Limited to prevent and discourage bribery.

UNACCEPTABLE BEHAVIOUR

The following behaviour by employees and representatives of the Company is unacceptable and must not occur in the organisation,

- Accepting any inducement (financial or other reward) which results in a personal gain or advantage to the recipient or any person associated with them.
- Requesting an inducement (financial or other reward) from any person in return for providing some favour.
- Offering any inducement (financial or other reward) to any person in return for providing some favour.

BUSINESS GIFTS

From time to time customers, suppliers or other persons might offer a gift to an employee. This could be a small gift or something of considerable value. Gifts (including discounted services) of excessive value, typically in excess of **£50**, should not be accepted by an employee or subcontractor acting on behalf of the Company, unless authorised by a Director. The Company may instruct an employee or representative to decline a gift, regardless of value, if in the opinion of Management, the acceptance of such a gift could compromise the integrity and reputation of the Company.

NOTIFICATION OF GIFTS/HOSPITALITY

From time to time customers or suppliers may invite an employee to a hospitality event. All such invitations must be reported to a Director. Permission must be given by a Director in advance in order for the employee to attend.

Inevitably, decisions as to what is acceptable may not always be easy. If anyone is in doubt as to whether a potential act constitutes bribery, the matter should be referred to a Director. Guidance can also be sought from HR.

EMPLOYEE RESPONSIBILITY

The prevention, detection and reporting of bribery is the responsibility of all employees throughout the Company.

COMPANY RESPONSIBILITY

Instances of alleged bribery will be rigorously investigated by the Company who will assist the police and other appropriate authorities in any resultant prosecution.

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COMPLIANCE WITH ANTI-BRIBERY AND CORRUPTION LAWS

Training on this policy forms part of the induction process for all new employees.

All existing employees will receive regular, relevant training on how to implement and adhere to this policy. In addition, all employees will be asked to accept conformance to this policy on an annual basis.

Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

ANNUAL REVIEW

The Quality Team and Managing Director will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audits by our external QSHE consultant to provide assurance that they are effective in countering bribery and corruption.

All employees are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing. Employees are invited to comment on this policy and suggest ways in which it might be improved.

COMPLIANCE WITH COMPETITION LAW AND HOW TO AVOID ANTI-COMPETITIVE BEHAVIOR

We are committed to competing vigorously and in a lawful manner. In doing so, we will:

- Avoid disclosing proprietary or confidential information in any contact with competitors.
- Not attempt to acquire information regarding a competitor's business by unlawful means, including industrial espionage, hiring competitors' employees to gain confidential information, urging competitors' employees to disclose confidential information, or any other approach that is not ethical.

WHO TO CONTACT?

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your line manager, HR or the managing director as soon as possible if you believe or suspect that a conflict with or breach of this policy has occurred or may occur in the future.



Joe Gallagher - Managing Director

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