

1.5 ANTI-BRIBERY POLICY STATEMENT

This policy is mandatory for all employees, agents, consultants, sub-contractors and suppliers of DMD Installations Ltd.

Any act of bribery, in whatever form, is unacceptable to this Company. The Company will consider taking disciplinary action against anyone who fails to comply with the anti-bribery policy, up to and including dismissal.

The following is absolutely prohibited under this policy:

- making unofficial payment to officials in order to obtain any permissions that wouldn't otherwise be granted;
- appointing any third party or supplier who you know, or have good reason to believe, has engaged in any corrupt or unlawful conduct or offences under The Bribery Act 2010;
- paying a third party for the purpose of providing access to key persons within an organisation;
- offering, paying, soliciting or accepting bribes in any form, including facilitation payments.

Employees may accept low value gifts such as branded pens, mouse mats etc. produced for the purpose of giving away, if given by an existing supplier. Occasional boxes of confectionary etc. may be given to a department as opposed to an individual; this is acceptable, although employees must refuse personal gifts such as Christmas, Wedding or Birthday gifts from any third party connected to the Company.

Employees of DMD Installations Ltd may occasionally receive invitations from suppliers or others to corporate hospitality or entertainment events. Hospitality or entertainment may only be accepted if:

- employees or personnel from the supplier are in attendance;
- the supplier does not pay for any accommodation or travel expenses (unless very trivial);

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- the entertainment and/or acceptance of it could not be interpreted as a reward, inducement or encouragement for a favour or preferential treatment;
- it is not unduly lavish or extravagant.

The Company does not make contributions or donations to political organisations or independent candidates, nor incur any political expenditure. The Company does however, respect the right of individuals to make personal contributions to political organisations or independent candidates, provided they are not made in any way to obtain advantage in business transactions.

DMD Installations Ltd conducts business with the highest levels of honesty and integrity. Any employee of the Company who is concerned about any malpractice, improper action or wrongdoing, is strongly encouraged to report the matter at the first available and safe opportunity to their immediate Supervisor or Manager. If the employee feels, for whatever reasons, that they are unable to raise the issue with their immediate Supervisor or Manager, they should make direct contact with the Managing Director.

This Policy will be reviewed at least annually. However, it will be reviewed sooner upon:

- changes in applicable Legislation
- changes to Company procedures
- changes to Company organisation

Signed:

Mr Dean Peruzzi – Managing Director

Date:

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