

## **Anti-Bribery and Corruption Policy**

### **Introduction**

This Policy establishes the standards of Southwest Steel Supplies Ltd) and supports the behaviors' we expect of everyone engaged by us when conducting business on our behalf.

The policy reinforces our values and enables us to build and maintain a reputation that our Business Partners, Customers, Employees and Suppliers are entitled to expect of us. Our ethical approach affects all areas of South West Steel Supplies Ltd.

This Anti-Bribery and Corruption Policy and Procedure (the Anti-Bribery Policy) forms part of our Ethics Policy and represents a commitment to doing what is right.

When working for South West Steel Supplies Ltd you are obliged to:

- 1 Uphold this commitment.
- 2 Ensure you understand the requirements of Anti-Bribery Policy and the Standards
- 3 Always follow them.
- 4

### **Policy statement**

South West Steel Supplies Ltd expects its employees to demonstrate honesty, integrity and fairness in all aspects of their business dealings and exercise appropriate standards of professionalism and ethical conduct in all their activities. The company expects the same approach from its business partners and suppliers.

South West Steel Supplies will not accept bribery or corruption in any form and has a 'zero tolerance' to any breach of this policy.

### **Application**

South West Steel Supplies Ltd and its employees will never seek, accept or give a bribe, facilitation payment, kickback or other improper payment. The company will operate with appropriate transparency in all our business dealings.

If an employee has any doubt as to whether something is appropriate, seek guidance from your Supervisor or Manager. If you are still uncomfortable or are concerned by the actions of others you can also use the confidential Whistleblowing helpline at (M.H.R Manager – 07703 582200).

## Our Policy

We will take appropriate steps to ensure that:

- We do not, directly or indirectly, offer, promise, give, accept or demand a bribe (including excessive gifts and hospitality) in order to obtain or retain business, or gain any other improper advantage.
- We do not offer, or give in to demands, to make illicit or illegal payments to agents, public officials, or the employees of business partners or anybody else that we do business with.
- We engage with and remunerate agents and other third parties only for legitimate services and adopt appropriate transparency in our approach.
- We promote employee awareness of, and compliance with, company policies against bribery and corruption through appropriate dissemination of our own procedures (including disciplinary procedures) policies and training programme`s at induction and thereafter.
- We adopt management control systems that discourage bribery and corruption, and adopt financial and tax accounting and auditing practices that prevent the establishment of "off the books" secret accounts or the creation of documents which do not properly and fairly record the transactions to which they relate.
- We do not make illegal or inappropriate contributions to candidates for public office or to political parties or to other political organizations.
- We raise awareness of the need to combat bribery and corruption with our business partners by publication of this Policy and (where appropriate) relevant contractual provisions and support initiatives designed to reduce the risk of bribery and corruption.

This policy has been endorsed by Mr. Mark Derrick, Director with full support of the management, and the workforce.

Signed .....  ..... on behalf of **South West Steel Supplies Ltd**

**Name:** Mark Derrick

**Position:** Director

**Date:** 22/05/2018