

PRL SITE SOLUTIONS - SPECIALIST



ANTI BRIBERY POLICY

POLICY STATEMENT

It is the Company (PRL Site Solutions Ltd) policy to conduct all of its affairs in an honest and ethical manner. The Company takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all the Company's business dealings and relationships wherever the Company operates.

The Company will uphold all laws relevant to countering bribery in all the jurisdictions in which the Company operates. The Company remain bound by the laws of the UK, including the Bribery Act 2010. Bribery is punishable for individuals by up to ten years' imprisonment and if the Company is found to have taken part in corruption, it could face an unlimited fine. The Company therefore takes its legal responsibilities very seriously.

1. PURPOSE

The aim of this procedure is to encouraging its employees to be vigilant and to report any suspicions of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately

2. RELATED DOCUMENTS

2.1 Bribery Act 2011

3. RESPONSIBILITY & SCOPE

3.1 Responsibility

3.1.1 It is the responsibility of the Directors to ensure that all staff both understand and comply with this Procedure

3.1.2 It is the responsibility of the Directors to ensure that this Procedure is updated to reflect identified changes resulting from the Company's review process.

3.1.3 The Directors in accordance with this Procedure will make any changes to this Procedure, or issue of authorised changes.

3.1.4 It is the responsibility of all staff to ensure that they are both familiar with this Procedure and that they are working to the current issue of documentation.

3.2 Scope

3.2.1 The requirements of this Procedure apply to all PRL Site Solutions operatives, employees & sub-contractors.

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4. PROCEDURE

No. Definition

4.1 Aims/Objectives

- 4.1.1 This procedure provides a coherent and consistent framework to enable the Company's employees to understand and implement arrangements enabling compliance. In conjunction with related policy and key documents it will also enable employees to identify and effectively report a potential breach.
- 4.1.2 We require that all personnel, including those permanently employed, temporary staff and contractors:-
- ▶ Act honestly and with integrity at all times and to safeguard the Company's resources for which they are responsible.
 - ▶ Comply with the spirit of the policy and of the laws and regulations of all jurisdictions in which the Company operates, in respect of the lawful and responsible conduct of activities.

4.2 What is Bribery

- 4.2.1 It is an inducement or reward offered, promised or provided to gain personal, commercial, regulatory or contractual advantage.

4.3 Bribery Act 2010

- 4.3.1 The Bribery Act 2010 makes it an offence to offer, promise or give a bribe (Section 1). It also makes it an offence to request, agree to receive, or accept a bribe (Section 2). Section 6 of the Act creates a separate offence of bribing a foreign public official with the intention of obtaining or retaining business or an advantage in the conduct of business.
- 4.3.2 There is also a corporate offence under Section 7 of failure by a commercial organisation to prevent bribery that is intended to obtain or retain business, or an advantage in the conduct of business, for the organisation. This is what is known as a "strict liability" offence. This means that there is no need to prove negligence or management complicity. An organisation will have a defence to this corporate offence if it can show that it had in place adequate procedures designed to prevent bribery by or of persons associated with the organisation.

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4.4 Penalties

- 4.4.1 An individual or Company guilty of an offence under sections 1, 2 or 6 is liable:
- ▶ On conviction in a magistrates court, to imprisonment for a maximum term of 12 months (six months in Northern Ireland), or to a fine not exceeding £5,000, or to both.
 - ▶ On conviction in a crown court, to imprisonment for a maximum term of ten years, or to an unlimited fine, or both.
 - ▶ The Company, if convicted under sections 1, 2 or 6 will also face the same level of fines and, if guilty of an offence under section 7, is liable to an unlimited fine.

4.5 Company Commitment

- 4.5.1 PRL Site Solutions will set out a clear anti-bribery policy and keep it up to date.
- 4.5.2 PRL Site Solutions will make all those permanently employed, temporary employed, contractors and consultants aware of their responsibilities to adhere strictly to the PRL Site Solutions policy at all times.

Action

- 4.5.3 PRL Site Solutions will ensure that training is provided to all employees (where required) so that they can recognise and avoid the use of bribery by themselves and others.

4.6 How to Evaluate What is Acceptable

- 4.6.1 First, take a step back and ask yourself the following:
- ▶ What is the intent - is it to build a relationship or is it something else?
 - ▶ What if the situation were to be reversed - would there be a double standard?
- 4.6.2 If you find it difficult to answer one of the above questions, there may be a risk involved which could potentially damage the company's reputation and business. The action could well be unlawful.
- 4.6.3 As a general rule, employees should not provide gifts to, or receive them from, any third parties.

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4.9 Transparency is Key

- 4.9.1 The Directors will be required to maintain and monitor the company gifts, entertainment and hospitality register. Any form of gift, entertainment or hospitality given, received or offered which meets or exceeds the equivalent of £200 in value - must be appropriately recorded in the register. In the event that an impermissible form of gift, entertainment or hospitality has been accepted, you must appropriately record the transaction within the register and contact the Directors immediately.

4.10 Staff Responsibilities

- 4.10.1 The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for the Company or under its control. All staff are required to avoid activity that breaches this procedure and PRL Site Solutions policy.

- 4.10.2 You must:
- ▶ Ensure that you read, understand and comply with this procedure and the PRL Site Solutions policy.
 - ▶ Raise concerns as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.
 - ▶ As well as the possibility of civil and criminal prosecution, those who breach this policy will face disciplinary action, which could result in dismissal for gross misconduct.

4.12 Raising a Concern

- 4.12.1 PRL Site Solutions is committed to ensuring that all employees have a safe, reliable, and confidential way of reporting any suspicious activity. We want each and every member of staff to know how they can raise concerns.
- 4.12.2 We all have a responsibility to help detect, prevent and report instances of bribery. If you have a concern regarding a suspected instance of bribery or corruption, please speak up - your information and assistance will help.
- 4.12.3 Concerns can be anonymous. In the event that an incident of bribery, corruption, or wrongdoing is reported, we will act as soon as possible to evaluate the situation. We have clearly defined procedures for investigating fraud, misconduct and non-compliance issues and these will be followed in any investigation of this kind.