

# ANTI-BRIBERY POLICY

## Policy statement

It is the policy of Hardscape Products Ltd (the firm) to conduct business in an honest and ethical manner. As part of that, the Firm takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships, wherever it operates, and implementing and enforcing effective systems to counter bribery.

## Purpose

The Firm will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which it conducts business, including, in the UK, the Bribery Act 2010 (the Act), which applies to conduct both in the UK and abroad.

## Scope and applicability

This policy applies to eligible individuals of the Act working for or on behalf of the Firm at all levels and grades, whether permanent, fixed-term or temporary, and wherever located, including consultants, contractors, seconded staff, casual staff, agency staff, volunteers & agents (herewith called workers).

In this policy, 3rd Party means any individual or organisation that Workers come into contact with during the course of work and the running of the Firm's business, and includes actual and potential clients, intermediaries, referrers of work, suppliers, distributors, business contacts, agents, advisers, government and public bodies (including their advisers, representatives and officials), politicians and political parties.

## What is bribery?

A bribe is an inducement or reward offered, promised or provided in order to improperly gain any commercial, contractual, regulatory or personal advantage, which may constitute an offence, examples are:

- Giving or offering a bribe;
- Receiving or requesting a bribe; or
- Bribing a foreign public official

## Gifts and hospitality

This policy does not prohibit normal and appropriate gifts and hospitality (given and received) to or from Third Parties unless otherwise specifically stated.

However, we have specific policies and procedures which provide guidance to Workers as to what is to be regarded as normal and appropriate gifts and hospitality in terms of financial limits or hospitality:

- Must not be made with the intention of improperly influencing
- A Third Party or Worker to obtain or retain business or a
- Business advantage, or to reward the provision or retention of
- Business or a business advantage, or in explicit or implicit
- Exchange for favours or benefits;
- Must comply with local law in all relevant countries;
- Must be appropriate in the circumstances;
- Must be of an appropriate type and value and given at an appropriate time taking into account the reason for the gift;
- Must be given openly, and
- In the case of gifts, they must not be offered to, or accepted from, government officials or representatives, politicians or political parties.

The Firm appreciates that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable both in the UK and any other relevant country. The intention behind the gift should always be considered.

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## What is not acceptable?

It is not acceptable for any Worker (or someone on their behalf) to:

- Give or offer, a payment, gift or hospitality with the expectation that they or the Firm will improperly be given a business advantage;
- Give or offer, a payment, gift or hospitality to a government official, agent or representative to facilitate or expedite a routine procedure;
- Accept payment from a 3rd Party where it is known or suspected that it is offered or given with the expectation that the 3rd Party will improperly obtain a business advantage;
- Accept a gift or hospitality from a 3rd Party where it is known or suspected that it is offered or provided with an expectation that a business advantage will be improperly provided by the Firm in return;
- Threaten or retaliate against another Worker who has refused to commit a bribery offence or who has raised concerns under this policy.

## Facilitation payments and “kickbacks”

We do not make, and will not accept, facilitation payments or “kickbacks” of any kind, such as small, unofficial payments made to secure or expedite a routine government action by a government official, or payments made in return for a business favour or advantage.

## Charitable Donations and Sponsorship

The Firm only makes charitable donations and provides sponsorship that are legal and ethical under local laws and practices and which are in accordance with the Firm's internal policies and procedures.

## Record keeping

We keep appropriate financial records and have appropriate internal controls in place which evidence the business reason for gifts, hospitality and payments made and received.

**Mathew Haslam**  
Managing Director