

ANTI-BRIBERY POLICY

Policy statement

It is the policy of Hardscape Products Ltd to conduct business in an honest and ethical manner. As part of that, we take 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

We 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 us at all levels and grades, whether permanent, fixed term or temporary, and wherever located, including employees, consultants, contractors, seconded staff, casual staff, agency staff, volunteers, and agents.

In this policy, 3rd Party means any individual or organisation that Workers encounter during work and the running of our 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 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 considering 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.

We appreciate 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.

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 Company 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 Company 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

We only make charitable donations and provide sponsorship that are legal and ethical under local laws and practices, and which are in accordance with our 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.

Alex Warren

Alex Warren
Managing Director