BROWNS
FASTENERS LTD

Cert No. RS426
Established 1953
Reg No. 521228

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Corruption & Bribery Policy

Browns Fasteners values honesty, transparency, integrity, and professionalism in dealings with suppliers, customers, government officials, and all other parties involved in with business dealings.

This Policy applies to all employees and gives specific details on the company's policy prohibiting corruption in the performance of business operations and individual employee responsibilities for ensuring adherence to the Policy.

The goal is to educate and inform employees of their anti-corruption obligations and to ensure compliance with the Company's Policy. It also provides information on how to identify potential risks, deal with challenging situations, and report when those situations violate or may lead to a violation of this policy.

The Company's Policy is to engage in business practices in full compliance with the Anti-Bribery Act, 2010 in the United Kingdom together with all other anti-corruption and anti-bribery laws and regulations applicable to the UK.

The Company has zero tolerance for any corruption in business activities. Bribes or other improper or unauthorised payments that directly or indirectly make, offer or promise to make, kickbacks, benefits, or advantages to any person, individual, organisation, or entity, are prohibited by this Policy.

A violation of this Policy can occur even if a bribe or other corrupt practice fails to achieve the desired outcome.

Gifts are commonly offered as gestures of gratitude or tokens of appreciation, but in some situations, they can also be construed as bribes. The Company does allow gifts made in good faith, but they must comply with this Policy.

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Personnel must ensure that any gifts are of value in proportion to the situation at hand, and any gifts should be infrequent to avoid being perceived as an attempt to influence an act or a decision. When offering or accepting a gift, employees should specifically consider the following:

• The intended outcome: Gifts can have many purposes, such as expressing appreciation and building a relationship, but they can also be viewed as an attempt to influence a direct result, e.g., to win a bid or affect the negotiation process.

• The Company's reputation: The gift may be a private act, but if it were to come to the public's attention, employees should consider how it would affect the reputation of the Company.

• Competition: A general rule of thumb is to think about how the Company would perceive a similar gift made by a competitor.

If Personnel should fail to comply with this Policy or Anti-Corruption Laws, they will be subject to disciplinary action up to and including termination of employment. If an employee is involved in or aware of a situation they believe may violate or lead to a violation of this Policy, they must ask for guidance from their manager or other personnel in a superior position.

AUTHORISED BY: 

NAME: PETE WEEKS POSITION: ASSOCIATE DIRECTOR / QUALITY
DATE: 1st OCTOBER 2026
(reviewed annually)

EMPLOYEE SIGNATURE OF RECEIPT AND UNDERSTANDING OF THE POLICY:

SIGNED:

NAME: DATE: