

Bribery Policy

This policy statement provides a framework within which staff must operate to avoid committing an offence under the Bribery Act 2010 (the 'Act'). The Act creates the following offences relevant to M Pearson Roofing Ltd: Paying bribes — it is an offence to offer, promise or give a bribe (so-called 'active bribery')

Receiving bribes — it is an offence to request, agree to receive or accept a bribe (so-called 'passive bribery') A person who is convicted of an offence of paying a bribe or receiving a bribe is liable on conviction to a maximum penalty of 10 years' imprisonment, a fine, or both.

A corporate offence is where a commercial organisation or associated person fails to prevent persons performing services on its behalf from committing bribery. M Pearson Roofing Ltd would beguilty of this offence if the person who performs a service on behalf of the organisation bribes another person intending; to obtain or retain business for M Pearson Roofing Ltd; or

to obtain of retain an advantage in the conduct of business for M Pearson Roofing Ltd.

If an organisation is found guilty of corporate bribery, the organisation, and its managers and/or directors could be subject to criminal sanctions. An 'associated person' acting on behalf of the company could potentially include M Pearson Roofing Ltd directors, staff, agents, and subcontractors. Acts of bribery or corruption are designed to influence an individual in the performance of their dutyand incline them, to act dishonestly. Bribes can take on different shapes and forms and often both parties will benefit. A bribe can involve a direct or indirect promise or offer of something of value, the offer or receipt of a loan, fee or reward or other advantage and/or giving of aid, donations or voting with the intention of exerting improper influence.

It is M Pearson Roofing Ltd policy to conduct its business in an open, honest, and transparent way and without the use of corrupt practices or acts of bribery to obtain an unfair advantage. The Company iscommitted to adherence to the highest legal and ethical standards, and this must be reflected in every aspect of the way in which M Pearson Roofing Ltd operate.

All staff will receive training which will enable them to be effective in the discharge of their responsibilities. The company does not preclude the acceptance of hospitality, gifts, or entertainment so long as they are reasonable. Limits are prescribed in the policy. The acceptance or commission of a bribe is an act of gross misconduct and renders that member of staff liable to disciplinary action if found guilty.

Staff dealing with or using other parties must be aware of the possibility of being influenced to engage in or facilitate bribery. Staff could, for instance, receive excessive hospitality or gifts in order that they, on the company's behalf, give business to the other party. Staff must not accept any gift, hospitality or entertainment which is, or could be, construed as being designed to influence you in the performance of your job and/or to influence you to act dishonestly.

Managing Direictor Michael Pearson 07/06/24

