

Anti- Corruption and Bribery Policy

Introduction

Hinds Building Services recognises the negative impact of corruption and bribery in the free market economy and it is our policy to conduct all of our business in an open, honest and ethical manner. We are committed to acting with integrity in all our business dealings and relationships and to implementing effective systems to prevent bribery. We will uphold all laws relevant to countering bribery and corruption, including the Bribery Act 2010, in every aspect of our conduct, including our dealings with public and private sector organisations. We will adopt a zero-tolerance approach to bribery and corruption.

This policy applies to all individuals working at all levels, and includes all employees (whether permanent, fixed-term or temporary), contractors, trainees, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries or their employees, wherever located.

The application of this policy to the day to day working of the company will ensure that this company upholds its key principle of quality and openness in every transaction.

Vision

To positively and proactively set out our responsibilities, and the responsibilities of those working for us in preventing bribery and corruption and provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues

Defining Key Terms

A **bribe** is an inducement or reward of a financial or other advantage that is offered, promised or provided to a person in order to gain any commercial, contractual, regulatory or personal advantage through the improper performance of a relevant function or activity as a result of the bribe.

Some examples of potential bribes may include:

- direct and indirect payments;
- shares or options;
- gifts;
- meals and entertainment;
- assumption or forgiveness of debt;
- promise of the grant of contracts;
- confidential information;
- offer of employment;
- payment of travel expenses; and
- personal favours.

Corruption is a broad concept that encompasses essentially any activity for personal gain.

Fraud includes any dishonest activity by employees or any other individual connected to the company which causes financial loss, including theft of money or other property by deception, deliberate falsification of documentation or improper use of information or position for personal financial benefit.

Defining Key Terms (Continued)

Some examples of fraud may include:

- theft of cash, plant, equipment, inventory, intellectual property or other confidential information;
- false invoicing;
- financial reporting fraud;
- obtaining property, a financial advantage, or any other benefit by deception (e.g. falsifying expense claims);
- causing a loss, or avoiding or creating a liability by deception (e.g. false accounting);
- release or use of misleading or inaccurate information for the purposes of deceiving, misleading or to hide wrongdoing;
- insider trading;
- providing false or misleading information to Hinds Building Services, or failing to provide information where there is an obligation to do so;
- making, using or possessing forged or falsified documents;
- bribery, or corruption (e.g. payment or receipt of kickbacks);
- causing unauthorised benefits to be given to a second party (e.g. manipulation of a tender process);
- bid or tender rigging;
- falsification of supplier quotes resulting in inflated procurement costs;
- fraudulent payment to fictitious suppliers or service providers;
- falsification of financial statements; and
- unlawful use of the company's computers, motor vehicles, telephones (including mobile telephones) and other property or services.

Charitable Contributions

Hinds Building Services is an active contributor to a number of social or community causes. It will not make charitable contributions or enter into sponsorship arrangements that could be perceived as a way of obtaining or retaining an improper advantage for the benefit of this company, or any other person. Donations must be solely for charitable and community purposes and sponsorships for business promotion purposes. Any charitable contributions and sponsorships must be permitted by law, must be authorised by the Managing Director in writing and not provided to individuals or organisations that are linked to a political cause.

Political Contributions

Hinds Building Services does not make any political contribution in any country. A political contribution is a contribution, whether financial or in-kind, support a political cause. A political cause includes political parties, party affiliated organisations, party officers and political candidates. If employees wish to participate in any event or activity for a political cause, they must first obtain the written approval of the Managing Director. If approval is given, participation is conditional on it being made clear that it is in the person's personal capacity (and not as a representative of Hinds Building Services), and the participant must use their own time and money to participate in the event or activity.

Facilitation Payments and Kickbacks

Hinds Building Services does not make, and will not accept, facilitation payments or "kickbacks" of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. They are not commonly paid in the United Kingdom, but are common in some other jurisdictions. All workers must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by this company.

Offers to cover Travel Expenses

Offer or promises to pay for travel expenses (transport, accommodation and incidental expenses), or providing transport and/or accommodation to foreign public official or other persons is prohibited except in the following circumstances:

- There is no intention to influence the official or other person in the exercise of their duties;
- The expense is appropriate to the relationship and accords with general business practices and local customs;
- The expense is approved in writing by the Managing Director;
- The provision is only for a specified and appropriate individual(s) and not to include any relatives, associates or other guests of the individual(s);
- The payment for travel is preceded by a written invitation from Hinds Building Services to the employer of the individual who it is proposed travel describing the purpose of and arrangements for the travel, which does not include side-trips;
- The travel is preceded by a written acceptance from the employer, including confirmation that the payment of the expense will not influence the individual in the exercise of their duties;
- The funds are paid directly to the service provider (unless otherwise approved in exceptional circumstances)

A clear record of any funds spent on travel should be kept.

Complaints Procedure

Where an employee or other stakeholder believes that he/she/it has been offered a bribe in relation to the services offered by this company, that employee or stakeholder is under a duty to report this to the Operations Manager who will investigate the claim and make a report to the Managing Director. The Operations Manager will rigorously investigate any claims of bribery. This can also be reported through one's line manager but the obligation is then on the line manager to report this to the Operations Manager. The Operations Manager will be required to speak to the actual reporting employee rather than recording the testimony of the employee, unless it is not possible for a range of reasonable and justifiable reasons to speak to the employee. It is critical that this is reported as soon as possible as this can lead to the covering up of some unlawful activity. In addition to this, with a view to creating a culture of openness, we encourage all employees and stakeholders to disclose any questionable behaviour, even if it implicates themselves.

Hinds Building Services will ensure that no one suffers any detrimental treatment as a result of refusing to accept or offer a bribe or other corrupt activities or because they reported a concern relating to potential act(s) of bribery or corruption. Detrimental treatment refers to dismissal, disciplinary action, treats, or unfavourable treatment in relation to the concern the individual raised.

Therefore, the responsibility of each employee is prevention, detection and reporting of potential offences.

Hinds Building Services will regularly monitor this complaints procedure to ensure its suitability for its employees and suppliers and will make the necessary changes as are necessary. At the very minimum, this policy will be updated annually.

Record Keeping

All complaints relating to actions undertaken that conflict or appear to conflict with this policy should be recorded by the Operations Manager. These are gifts, loosely defined, that have been offered and/or accepted.

Training

Training on this policy forms part of the induction process for all new workers. If members of staff have any ideas on this policy can be improved, they should contact the Operations Manager and provide details of such suggestions. Continued training of staff generally and staff in key roles will also be undertaken.

Accessibility

All information, which support this policy, will be provided to employees in an accessible format. Where relevant, clients can request alternate accessible formats.

Legal Compliance

Hinds Building Services is committed to building and maintaining a reputation for integrity and honesty and will ensure compliance with all legislation, regulatory instruments, standards and internal policies, including this policy. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. Any non-employee who breaches this policy may have their contract terminated with immediate effect.

Management Team, Hinds Building Services

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