

It is the policy of Industrial Coating Services Limited (ICS) to conduct business in an honest and ethical manner. As part of that, ICS 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

This anti-bribery policy exists to set out the responsibilities of ICS and those who work for us in regards to observing and upholding zero-tolerance position on bribery and corruption.

ICS will uphold all laws applicable 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 all individuals working for or on behalf of ICS, 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, sponsors and any other person who performs services for or on behalf of the Company.

In the context of this policy, third party refers to any individual organisation the Company meets and works with. It refers to actual and potential clients, customers, suppliers, distributors, business contacts, agents' advisors and government and public bodies including their advisors, representatives, officials, politicians and public parties.

DEFINITION

Bribery refers to the act of offering, giving, promising asking, agreeing, receiving, accepting or soliciting something of value or of an advantage so to induce or influence an action or decision.

A bribe refers to any inducement, reward or object/ item of value offered to another individual in order to gain commercial, contractual, regulatory or personal advantage.

Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law.

Bribery is illegal. Employees must not engage in any form of bribery, whether it be directly, passively (described above) or through a third party (such as an agent or distributor). They must not accept bribes in any degree and if they are uncertain about whether something is a bribe, a gift or act of hospitality, they must seek further advice from the Managing Director.

GIFTS AND HOSPITALITY

ICS accepts normal and appropriate gestures of gifts and hospitality (whether given to/ received from third parties) so long as the giving or receiving if the gift meets the following requirements:

- It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits
- It is not made with the suggestion that a return favour is expected
- It is in compliance with local law
- It is given in the name of the Company, not in an individual's name

- It does not include cash or cash equivalent
- Must be appropriate in the circumstances
- It is of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift
- It is given/ received openly, not secretly
- It is not selectively given to a key, influential person, clearly with the intention of directly influencing them
- It is not valued in excess of £100
- It is not offered to, or accepted from, a government official or representative or politician or political party, with prior approval of the Managing Director.

As good practice gifts given and received should always be disclosed to the Managing Director. Gifts from suppliers should always be disclosed.

The intention behind a gift being given and received should always be considered. If there is any uncertainty the advice of the Managing Director should be sought.

FACILITATION PAYMENTS AND KICKBACKS

ICS 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 CONTRIBUTIONS

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

EMPLOYEE RESPONSIBILITIES

As an employee of ICS, you must ensure that they read, understand and comply with the information contained within this policy and with any training or other anti-bribery and corruption information you are given.

All employees and those under the Company’s control are equally responsible for the prevention, detection and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply a breach of this anti-bribery policy.

If you have reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, you must notify the Managing Director.

Any employee found to breach this policy will face disciplinary action and could face dismissal for gross misconduct. ICS has the right to terminate a contractual relationship with an employee if they breach this anti-bribery policy.

RAISING A CONCERN

Where there is a suspicion of bribery or corrupt activities occurring in relation to ICS, employees are encouraged to raise their concerns as soon as possible with the HSQE Manager or Managing Director.

ICS will familiarise all employees with its Whistle Blowing policy so employees can vocalise their concerns swiftly and confidentially.

You must tell the Managing Director as soon as possible if you are offered a bribe by anyone, if you are asked to make one, if you suspect you may be bribed or asked to make a bribe in the near future or you have reason to believe that you are a victim of another corrupt activity.

If you refuse to accept or offer a bribe or you report a concern relating to potential act(s) of bribery or corruption, ICS understands that you may feel worried about potential repercussions. ICS will support anyone who raises concerns in good faith under this policy even if investigation finds that they were mistaken.

ICS 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.

TRAINING AND COMMUNICATION

ICS will provide training on this policy and our zero-tolerance approach to bribery and corruption as part of the Induction process and annually thereafter.

The policy will, where appropriate be communicated to clients, suppliers, contractors and business partners.

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.

MONITORING AND REVIEW

The HSQE Manager is responsible for monitoring the effectiveness of this policy and will review the implementation on it on a regular basis, assessing its suitability, adequacy and effectiveness.

This policy does not form part of an employee's contract of employment and ICS may amend it at any time to improve its effectiveness at combating bribery and corruption.

Signed:



Printed: *Richard Parker, Managing Director*

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