

Anti-Bribery Policy

It is our policy to conduct all our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our dealings wherever we operate. We are also committed to implementing and enforcing effective systems to counter bribery.

1. Area of Operation

This policy covers all business operations at our Head Office based in Teesside and our second branch in Rotherham

2. Who is covered by the policy?

This policy applies to all individuals working at all levels and grades, including directors, senior managers, employees (whether permanent, fixed-term or temporary), contractors, and any other person providing services to us.

3. What is a bribe?

A bribe is a financial or other advantage offered or given:

- 3.1 To anyone to persuade them to or reward them for performing their duties improperly or;
- 3.2 To any public official with the intention of influencing the official in the performance of his duties.

4. Gifts and Hospitality

4.1 This policy does not prohibit giving and receiving promotional gifts of low value and normal and appropriate hospitality. However, in certain circumstances gifts and hospitality may amount to bribery and all employees must comply strictly with Aircon Refrigeration Ltd.'s ethics policy in respect of gifts and hospitality.

4.2 We will not provide gifts or hospitality with the intention of persuading anyone to act improperly or to influence a public official in the performance of his duties.

5. Facilitation payments and kickbacks

5.1 We do 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.

5.2 Kickbacks are typically payments made in return for a business favour or advantage. All Aircon employees must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.

6. Donations

6.1 We do not make contributions of any kind to political parties. No charitable donations will be made for gaining any commercial advantage.

7. Record Keeping

7.1 We will keep financial records and have appropriate internal controls in place which will evidence the business reason for making any payments to third parties.

7.2 All expense claims relating to hospitality, gifts or expenses incurred to third parties must be submitted in accordance with our expenses policy and specifically records the reason for the expenditure.

7.3 All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers, and business contacts, must be prepared and maintained with strict accuracy and completeness. No accounts must be kept “off-book” to facilitate or conceal improper payments.

8. Raising Concerns

- 8.1 Employees will be encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage.
- 8.2 No employee will suffer any detriment because of raising genuine concerns about bribery, even if they turn out to be mistaken.

9. Monitoring

- 9.1 The Directors will regularly review the effectiveness of this policy.
- 9.2 Internal control systems and procedures will be subject to audit under the internal audit process.

10. Responsibility

- 10.1 The Directors of Aircon Refrigeration Limited are responsible for this Policy.
- 10.2 Senior managers are responsible for implementation and communication of the policy in their areas of operation.



Signed:

Managing Director: Mr. S. Farrell

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Author	Ron Agar	Review date
Reference / Version	ARL/ABP/2011/v1	ARL/ABP/2011/v1
Date of Issue	3/11/2012	21/11/2018
Next Review	Annually	21/11/2019