



ANTI-BRIBERY POLICY

Introduction

Bribery is a criminal offence. The Company prohibits any form of bribery. We require compliance, from everyone connected with our business, with the highest ethical standards and anti-bribery laws applicable. Integrity and transparency are of the utmost importance to us and we have a zero tolerance attitude towards corrupt activities of any kind, whether committed by Hurst Group (Northern) Ltd employees or by third parties acting for or on behalf of Hurst Group (Northern) Ltd.

Policy

It is prohibited, directly or indirectly, for any employee or person working on our behalf to offer, give, request or accept any bribe i.e. gift, loan, payment, reward or advantage, either in cash or any other form of inducement, to or form any person or company in order to gain commercial, contractual or regulatory advantage for the Company, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.

We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions we operate in. However, we remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both home and abroad.

If we suspect that you have committed an act of bribery or attempted bribery, an investigation will be carried out and, in line with our disciplinary procedure where appropriate, action may be taken against you which may result in dismissal, or the cessation of our business arrangement with you.

If you, as an employee or person working on our behalf, suspect that an act of bribery or attempted bribery has taken place, even if you are not personally involved, you are expected to report this to the Personnel Director. You may be asked to give a written account of events.

Staff are reminded of the Company's Whistle Blowing Policy which is available in the Employee Handbook, or upon request.

Gifts and hospitality

We realise that the giving and receiving of gifts and hospitality as a reflection of friendship or appreciation where nothing is expected in return may occur, or even be commonplace, in our industry. This does not constitute bribery where it is proportionate and recorded properly.

No gift should be given nor hospitality offered by an employee or anyone working on our behalf to any party in connection with our business without receiving prior written approval from the Personnel Director or Senior Company Directors. Similarly, no gift nor offer of hospitality should be accepted by an employee or anyone working on our behalf without receiving prior written approval from the Personnel Director or Senior Company Directors.

A record will be made of every instance in which gifts or hospitality are given or received.

As the law is constantly changing, this policy is subject to review and the Company reserves the right to amend this policy without prior notice.



L Hirst
Personnel Director
8th December 2019