

# ANTI-BRIBERY AND CORRUPTION POLICY

## 1. POLICY STATEMENT

1.1 It is the policy of with Martindale Electric Co. Ltd. (“the Company”) to conduct all of 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 business dealings and relationships. We implement and enforce effective systems to counter bribery.

1.2 The Company will uphold all laws relevant to countering bribery and corruption but remains bound by the laws of the UK, including the Bribery Act 2010 (“the Act”) in respect of our conduct both in the UK and abroad.

1.3 The purpose of this policy is to:

(a) set out our responsibilities and of those working for us, in observing and upholding our position on bribery and corruption;

(b) provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues.

1.4 Under the Act, bribery and corruption are punishable for individuals by up to 10 years imprisonment and if the Company is found to have taken part in corruption, we could face an unlimited fine, be excluded from tendering for public contracts and face serious damage to our reputation.

1.5 In this policy, “third party” means any individual or organisation you come into contact with during the course of your work with the Company and includes actual and potential customers, referrers, suppliers, distributors, business contacts, agents, advisors, government and public bodies, including their advisors, representatives and officials, politicians, and political parties.

1.6 The Company’s Compliance Officer is currently The Company Secretary.

## 2. WHO IS COVERED BY THE POLICY?

This policy applies to all individuals working at all levels including employees (whether permanent, fixed-term, or temporary), contractors, seconded staff, home-workers, casual workers and agency staff, interns and work placement students, agents, sponsors, volunteers or any other person associated with the Company wherever located (collectively referred to as “workers”) in the Policy.