



# Anti-Bribery Policy

## 1. Introduction

Pickstock Telford Ltd is committed to holding responsible and fair business practices. It is committed to promoting and maintaining the highest level of ethical standards in relation to all its business activities. Our reputation for maintaining lawful business practices is of paramount importance and this Policy is designed to preserve these values. Pickstock therefore has a zero tolerance policy towards bribery and corruption and is committed to acting fairly and with integrity in all of its business dealing and relationships and implementing and enforcing effective systems to counter bribery.

Pickstock Telford Ltd Anti- bribery Policy outlines the behaviour and principles required to support this commitment. Pickstock intend to ensure compliance with the UK's

## 2. Purpose and Scope

This policy sets out Pickstock Telford's position on any form of bribery and corruption and provides guidelines aimed at:

- ensuring compliance with anti-bribery laws, rules and regulations, not just within the UK but in any other country within which the company may carry out its business or in relation to which its business may be connected.
- enabling employees and persons associated with the company to understand the risks associated with bribery and to encourage them to be vigilant and effectively recognise, prevent and report any wrong doing, whether by themselves or others.
- providing suitable and secure reporting and communication channels and ensuring that any information that is reported is properly and effectively dealt with.
- creating and maintaining a rigorous and effective framework for dealing with any suspected instances of bribery or corruption.

This Policy applies to all permanent and temporary employees if the Company (including any of its intermediaries, subsidiaries or associated companies). It also applies to any individuals or corporate entity associated with the Company or whom performs functions in relation to, or for and on behalf of, the Company, including, but not limited to, directors, agency workers, casual workers, contractors, consultants, seconded staff, agents, suppliers and sponsors (2associated person"). All employees and associated persons are expected to adhere to the principles set out in this Policy.

Version 3		
Revised by Louise Workman, HR Manager	Revised on 12/07/2024	Revision due: 07/2025
Approved by Greg Pickstock, MD	Approved on	



### 3. Legal Obligations

The UK legislation on which this policy is based is the Bribery Act 2010 and it applies to the Company's conduct both in the UK and abroad. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

It is an offence in the UK to:

- offer, promise or give a financial or other advantage to another person (i.e. bribe a person), whether within the UK or abroad, with the intention of inducing or rewarding improper conduct
- request, agree to receive or accept a financial or other advantage (i.e. receive a bribe) for or in relation to improper conduct
- bribe a foreign public official

You can be held personally liable for any such offence.

It is also an offence in the UK for an employee or an associated person to bribe another person in the course of doing business intending either to obtain or retain business, or to obtain or retain an advantage in the conduct of business, for the Company. Pickstock can be held liable for this offence where it has failed to prevent such bribery by associated person. As well as an unlimited fine, it could suffer substantial reputational damage.

### 4. Policy Statement

All employees and associated persons are required to:

Comply with any anti-bribery and anti-corruption legislation that are mentioned within this policy.

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