

Subject : Anti-Bribery Policy			Doc. # : HR-P-016	
Originator : Louise Workman, HR Manager	Mod. Date : 12/08/2026	Rev. Date : 12/08/2028	Version#: 4	

ANTI-BRIBERY POLICY

Pickstock Telford Ltd has zero tolerance for bribery and corruption. No business objective, commercial pressure or local custom justifies offering, giving, requesting or accepting an improper advantage.

1. Introduction

Pickstock Telford Ltd is committed to conducting business honestly, ethically, fairly and transparently. The Company promotes and maintains high standards of integrity across all business activities and relationships.

The Company operates a zero-tolerance approach to bribery and corruption. It is committed to implementing and maintaining proportionate systems and controls designed to prevent, identify and address bribery and corruption involving the Company, its employees or any person acting for or on its behalf.

This Policy sets out the standards of conduct expected and supports compliance with the Bribery Act 2010 and other applicable anti-bribery and anti-corruption laws in any country connected with the Company's activities.

2. Purpose and Scope

The purpose of this Policy is to:

- set out the Company's position on bribery and corruption;
- help employees and associated persons recognise bribery and corruption risks;
- establish requirements for preventing, declaring and reporting improper conduct;
- provide suitable and secure routes for reporting concerns;
- ensure concerns are considered and dealt with appropriately; and
- maintain a clear framework for the management, investigation and review of suspected bribery or corruption.

This Policy applies to all permanent and temporary employees, directors, agency workers, casual workers, contractors, consultants, seconded staff and volunteers. It also applies to any individual or organisation performing services for or on behalf of the Company, including agents, intermediaries, suppliers, distributors, sponsors and subcontractors. These parties are referred to in this Policy as "associated persons".

All employees and associated persons are expected to comply with the principles and requirements of this Policy. Where local law imposes a higher standard, the higher standard must be followed.

3. Definitions

Term	Meaning
Bribery	Offering, promising, giving, requesting, agreeing to receive or accepting a financial or other advantage in circumstances involving the improper performance of a function or activity.
Corruption	The abuse of entrusted power or position for private or improper gain.

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Term	Meaning
Financial or other advantage	Anything of value, including cash, gifts, hospitality, services, contracts, employment opportunities, preferential treatment, discounts or other benefits.
Facilitation payment	An unofficial payment intended to secure or speed up a routine action.
Kickback	A payment, benefit or advantage provided in return for favourable treatment or an improper business decision.
Foreign public official	An individual holding a legislative, administrative or judicial position outside the UK, a person exercising a public function for another country or public body, or an official or agent of a public international organisation.
Associated person	A person or organisation performing services for or on behalf of the Company. Whether a person is associated will depend on the circumstances, not only on their job title or contractual label.

4. Legal Obligations

The Bribery Act 2010 applies to relevant conduct in the United Kingdom and, in certain circumstances, conduct outside the United Kingdom. The Act creates four principal offences:

- offering, promising or giving a financial or other advantage with the intention of inducing or rewarding improper performance;
- requesting, agreeing to receive or accepting a financial or other advantage in connection with improper performance;
- bribing a foreign public official to obtain or retain business or an advantage in the conduct of business; and
- a commercial organisation failing to prevent bribery by a person associated with it, unless the organisation can show that it had adequate procedures designed to prevent such conduct.

Individuals may be personally liable for bribery offences. The Company may also face criminal penalties, an unlimited fine, loss of business opportunities and serious reputational harm.

5. Policy Statement and Prohibited Conduct

Employees and associated persons must conduct business fairly, honestly and with integrity. They must not, directly or indirectly:

- offer, promise, give, request, agree to receive or accept a bribe;
- use a third party to do anything that would breach this Policy if done directly;

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- make or receive facilitation payments, kickbacks or secret commissions;
- offer or accept any advantage intended to influence a business, contractual, procurement, regulatory or employment decision;
- abuse their position, Company resources or confidential information for personal or improper gain;
- create false, misleading, incomplete or off-the-book records to disguise a payment or benefit;
- threaten, disadvantage or retaliate against anyone who refuses to participate in bribery or raises a genuine concern; or
- ignore warning signs or deliberately avoid information indicating that bribery may be occurring.

No employee or associated person will be penalised by the Company for refusing to participate in bribery, even where that refusal may result in delay, additional cost or loss of business.

6. Gifts, Hospitality and Business Entertainment

Reasonable and proportionate gifts, hospitality and business entertainment may form part of legitimate business relationships. They must never be used, or appear to be used, to secure an improper advantage or influence a decision.

Gifts or hospitality may only be offered or accepted where they are:

- lawful, reasonable and proportionate;
- infrequent and appropriate to the circumstances;
- connected to a legitimate business purpose;
- transparent and capable of public scrutiny;
- not offered or accepted during a live tender, procurement, contract award, inspection or other sensitive decision-making process; and
- approved and recorded in accordance with Company requirements.

Cash gifts and cash equivalents, including personal loans and readily exchangeable vouchers, must not be offered or accepted. Employees must obtain prior written approval from their Line Manager before offering or accepting any gift or hospitality connected with Company business. Every approved, declined or returned gift or hospitality item must be recorded in the Gifts and Hospitality Register.

Where refusal could cause offence or create a safety concern, the item should be accepted on behalf of the Company, reported immediately and dealt with as directed by a Line Manager, HR or a Director.

7. Facilitation Payments and Kickbacks

The Company prohibits facilitation payments and kickbacks of any kind, regardless of value, local custom or whether they are described as routine, administrative or expediting fees.

Any request for such a payment must be refused and reported immediately to a Director or the HR Manager. If an employee reasonably believes that their health, safety or liberty, or that of another person, is at immediate risk, they should prioritise safety, make the minimum payment necessary if there is no safe alternative, and report the incident as soon as possible. The payment must be accurately recorded and must not be disguised.

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8. Conflicts of Interest

Employees and associated persons must avoid situations in which personal, financial or other interests conflict, or could reasonably appear to conflict, with the interests of the Company.

Actual, potential or perceived conflicts must be declared promptly to the relevant Line Manager or HR. Examples include personal relationships with suppliers, applicants or contractors; outside employment or financial interests involving a business partner or competitor; and receiving a personal benefit connected with a Company decision. Declaration does not necessarily prevent involvement, but the conflict must be assessed and managed before the person participates in the relevant decision.

9. Charitable Donations and Sponsorship

Charitable donations, community support and sponsorship must be lawful, transparent, properly authorised and accurately recorded. They must not be offered or used to obtain an improper business or personal advantage. Appropriate checks must be completed to confirm the identity and legitimacy of the recipient and the intended purpose of the payment or benefit.

10. Political Contributions

No political contribution, donation, sponsorship or other support may be made in the Company's name or using Company resources unless it has been expressly authorised by the Managing Director and is lawful, transparent and accurately recorded. Employees may participate in lawful political activity in a personal capacity, but must not suggest that they represent the Company unless specifically authorised.

11. Third Parties, Suppliers and Due Diligence

The Company expects suppliers, contractors, agents, intermediaries and other business partners to act consistently with this Policy. The level of due diligence and oversight applied must be proportionate to the nature, value, location and risk of the relationship.

Where appropriate, controls may include:

- checking the identity, ownership, reputation, qualifications and business rationale of a proposed third party;
- considering country, sector, transaction and public official exposure;
- using written agreements that clearly describe services, fees and anti-bribery obligations;
- requiring suppliers or associated persons to acknowledge the Policy;
- ensuring payments are reasonable, properly authorised and made to an account held in the contracting party's name;
- monitoring performance, invoices, expenses and changes in ownership or scope; and
- suspending or terminating a relationship where concerns cannot be satisfactorily resolved.

Warning signs must be escalated. Examples include requests for cash, unusual commissions, vague services, excessive urgency, offshore or third-party payment instructions, refusal to provide information, close links to a decision-maker, or a request to conceal the arrangement.

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12. Reporting Concerns

Employees and associated persons must report actual, suspected or attempted bribery, corruption, retaliation or breaches of this Policy promptly. Concerns may be raised with:

- the employee's Line Manager;
- the HR Manager;
- a Director; or
- through the Company's Whistleblowing Procedure.

Reports should include available facts, dates, persons involved, documents and any immediate risk. Employees must not investigate the matter themselves, confront suspected persons or destroy, alter or conceal relevant information.

Concerns will be handled sensitively and, where reasonably possible, confidentially. Absolute confidentiality cannot be guaranteed where disclosure is necessary to investigate, protect individuals, comply with legal obligations or take appropriate action.

13. Protection for Those Raising Concerns

The Company will support any person who raises a genuine concern or refuses to participate in bribery. It will not tolerate dismissal, disciplinary action, victimisation, harassment or any other detriment because a person has raised a concern in good faith or assisted an investigation.

A deliberately false or malicious allegation may be dealt with under the Disciplinary Procedure. A concern that is honestly raised but not substantiated will not, by itself, result in disciplinary action.

14. Record Keeping and Financial Controls

Accurate, complete and timely books, records and accounts must be maintained. Employees and associated persons must:

- record transactions, expenses, gifts, hospitality, donations, sponsorship and commissions accurately and in reasonable detail;
- retain supporting evidence and obtain required approvals;
- never create undisclosed accounts, false descriptions, duplicate invoices or misleading entries;
- never split or reclassify a payment to avoid an approval limit or control; and
- co-operate with audits, reviews and requests for information.

Records must be retained and disposed of in accordance with the Company's document retention and data protection requirements.

15. Responsibilities**Senior Leadership Team**

- approve and visibly support this Policy;
- promote an ethical culture and allocate appropriate resources;
- ensure significant risks and allegations are considered and addressed; and
- review the effectiveness of the Company's anti-bribery arrangements.

HR Manager

- maintain and coordinate review of this Policy;
- support communication, training, reporting and investigations;
- maintain appropriate records relating to reported concerns and policy actions; and
- escalate material concerns to the appropriate Director.

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Managers

- lead by example and ensure employees understand the Policy;
- consider bribery risks in decisions and third-party relationships;
- ensure gifts, hospitality and conflicts are declared and recorded; and
- escalate concerns promptly and preserve confidentiality.

Employees and Associated Persons

- read, understand and comply with this Policy;
- complete required training;
- remain alert to risk indicators;
- seek advice where uncertain; and
- report concerns promptly and co-operate with investigations.

16. Training and Communication

The Company will provide information, instruction and training proportionate to roles and identified risks. This may include induction, refresher communication and targeted training for employees involved in procurement, finance, sales, recruitment, regulatory engagement or management of third parties.

The Company's zero tolerance position and relevant contractual expectations will be communicated to suppliers, contractors and other associated persons where appropriate.

17. Breaches and Investigations

Suspected breaches will be assessed and investigated fairly and appropriately. Employees may be required to provide information, preserve documents and co-operate with the investigation. Where necessary, the Company may take interim steps to protect evidence, people or business interests.

A breach by an employee may result in disciplinary action up to and including summary dismissal for gross misconduct. A breach by an associated person may result in suspension or termination of the business relationship. The Company may report suspected criminal conduct to the police, regulators or other appropriate authorities and may seek recovery of losses.

18. Monitoring and Review

The HR Manager will coordinate periodic review of this Policy and the related risk assessment. Review will take place at least annually and sooner following a significant legal, organisational, operational or risk change, a material incident, an audit finding or evidence that controls may be ineffective.

Monitoring may include review of reported concerns, gifts and hospitality records, conflicts of interest, third-party checks, training completion, investigations, audit findings and corrective actions. Lessons identified will be used to improve controls, communication and training.

Related Documents

- Whistleblowing Policy
- Disciplinary Procedure
- Code of Conduct
- Expenses Policy
- Procurement and Supplier Approval Procedures
- Gifts and Hospitality Register
- Conflicts of Interest Declaration
- Supplier Code of Conduct or Supplier Acknowledgement Form
- Document Retention and Data Protection Requirements