



HALL & PICKLES, Poynton Industrial Estate, London Road, Poynton, Stockport SK12 1NB
Telephone: 01625 878787 Facsimile: 01625 878057
Email: hpsales@hallandpickles.co.uk

Hall & Pickles a division of Hall & Pickles 1812 Limited

Anti Corruption and Bribery Policy Statement

Hall & Pickles a division of Hall & Pickles 1812 Limited values its reputation for ethical behaviour and for financial integrity and reliability. Hall & Pickles a division of Hall & Pickles 1812 Limited is committed to maintaining the highest standards of ethics and compliance with all relevant laws whenever we do business including anti corruption and bribery.

The Bribery Act 2010 aims to promote anti-bribery practices amongst businesses and came into force effective 1st July 2011. 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 business dealings and relationships.

Any employee who breaches this policy will face disciplinary action, which may result in dismissal for gross misconduct. Any non-employee who breaches this policy may have their Contract/Agreement terminated with immediate effect.

What is bribery?

Bribe means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit.

Bribery includes offering, promising, giving, accepting or seeking a bribe.

All forms of bribery are strictly prohibited. Hall & Pickles a division of Hall & Pickles 1812 Limited expects that all employees, if unsure about whether a particular act constitutes bribery, then to raise it with their line manager or the HR department. It will then be determined whether it is necessary to carry out a risk assessment to establish the extent of exposure to bribery.

Specifically, Hall and Pickles a division of Hall & Pickles 1812 Limited expects that all employees must not:

Give or offer any payment, gift, hospitality or other benefits in the expectation that a business advantage will be received in return, or to reward any business received.

Accept any offer from a third party that you know, or suspect is made with the expectation that we will provide a business advantage for them or anyone else.



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Give or offer any payment (sometimes called a facilitation payment) to a government official in any country to facilitate or speed up a routine or necessary procedure.

Hall & Pickles a division of Hall & Pickles 1812 Limited expects that all employees must not threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.

Gifts, Favours and hospitality.

Specifically, Hall and Pickles a division of Hall & Pickles 1812 Limited expects that all employees must not:

No gifts (other than advertising matter of modest value such as calendars, diaries etc.) or favours should be accepted by a company employee, or his/her close family, from people or organisations with whom the employee has, or it is reasonable to expect may have, business dealings on behalf of the company. Similarly, company employees should not offer gifts or favours to business contacts of their close families. Gifts must never include cash or cash equivalent (such as vouchers), or be given in secret. Gifts must be given in the company name, not the employee's name.

Offers to a company employee, or his/her close family, of hospitality or entertainment of a frequency, type or scale which the company would not wish to reciprocate, should not be accepted. Rigid definitions are not possible, but Hall & Pickles a division of Hall & Pickles 1812 Limited looks to its employees to exercise common sense and judgement and, if in any doubt to decline an offer or if in doubt, refer to the HR department for further clarification.

Any offer of an unreasonable generous gift, favour or hospitality that is received should immediately be reported by the employee in writing to his/her line manager or HR department.

It is the responsibility of the employee to declare and keep a written account of all hospitality or gifts given or received. Employees must also submit all expenses claims relating to hospitality, gifts or payments to third parties in accordance with the company expenses policy and record the reason for expenditure.

All accounts, invoices and other records relating to dealings with third parties including suppliers and customers should be prepared with strict accuracy and completeness. Accounts must not be kept "off-book" to facilitate or conceal improper payments.



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How to raise a concern

Hall & Pickles a division of Hall & Pickles 1812 Limited would expect employees that are offered a bribe, or are asked to make one, or if they suspect that any bribery, corruption or other breach of this policy has occurred or may occur, they must notify their Line Manager or the HR Department as soon as possible.

Signed: *J.M. Woodward*

Quality Assurance Group Manager

Date: June 2024

Approved by:

Signed: *[Signature]*

Group M.D / CEO

Date: June 2024