

## **Anti-Corruption & Bribery Policy**

It is Matrix Precision Engineering Ltd policy 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 relationships and business dealings. We implement and enforce effective systems to counter bribery.

We recognise and will uphold all laws relevant to countering bribery and corruption. We are bound by the laws of the UK, including the Bribery Act 2010.

We understand that Bribery and corruption are punishable for individuals by up to ten years' imprisonment and if we are found to have taken part in corruption we could face an unlimited fine and face damage to our reputation. We therefore take our legal responsibilities very seriously.

We take the following steps to reduce risk of anti-bribery and corruption:

- Have and share this policy with all our workforce, new employees, all clients and potential clients, all suppliers and potential suppliers, all sub-contractors and potential sub-contractors.
- Undertake a risk assessment exercise and review annually and update this policy.
- Undertake training & awareness programme of senior management and sales executives.
- Training all employees so that they can recognise and avoid the use of bribery by themselves and others.
- Encouraging our employees to be vigilant and to report any suspicion of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately;
- Rigorously investigate instances of alleged bribery and assist the police and other appropriate authorities in any resultant prosecution;
- Taking firm and vigorous action against any individual(s) involved in bribery.
- Prepare standard clauses relating to Bribery Act issues for inclusion in key contractual documentation.

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

We have identified that certain activities create particular risks for our organisation, in particular:

- Receipt of gifts from suppliers, sub-contractors and potential suppliers and sub-contractors.
- Requests to provide gifts in respect to securing of new business.

Matrix Precision Engineering Ltd prohibits the offering, the giving, the solicitation or the acceptance of any bribe, whether cash or other inducement. To or from any person or company, wherever they are situated and whether they are a public official or body or private person or company by any individual employee, agent or other person or body acting on the company's behalf in order to gain any commercial, contractual or regulatory advantage for the company in a way which is unethical or in order to gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.

Certain gifts may be customary in a particular market, or festivity and may be proportionate and can be accepted if properly recorded. This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties and the giving or receipt of gifts, provided that this is done without the intention of influencing a third party to obtain or retain business or a business advantage. All gifts of hospitality or small gifts are to be given openly, not secretly and declared to senior management.

- Normal and appropriate hospitality
- The giving of a ceremonial gift on a festival or at another special time
- The offer of resources to assist the person or body to make the decision more efficiently provided that they are supplied for that purpose only.

Inevitably, decisions as to what is acceptable may not always be easy. If anyone is in doubt as to whether a potential act constitutes bribery, the matter should be referred to the Managing Director who has responsibility for this policy before proceeding.

### **Further Clarification**

Matrix Precision Engineering Ltd recognises that market practice varies across the territories in which it does business and what is normal and acceptable in one place may not be in another. This policy prohibits any inducement which results in a personal gain or advantage to the recipient or any person or body associated with them, and which is intended to influence them to take action which may not be solely in the interests of the company or of the person or body employing them or whom they represent.

### **Employee Responsibility**

The prevention, detection and reporting of bribery is the responsibility of all employees throughout the Company. Suitable channels of communication by which employees or others can report confidentially any suspicion of bribery will be maintained via the whistle-blower's direct access to the Managing Director.

Signed \_\_\_\_\_ Date \_\_\_\_\_  
Name: \_\_\_\_\_ Position: Director