



Anti-Bribery and Corruption Policy:

Introduction:

Ashton Scaffolding Services Ltd values its longstanding reputation for ethical behaviour and integrity. Conducting business with a zero tolerance to all forms of corruption is central to these values, image and reputation. The policy below sets out the standards expected of all Ashton's employees in relation to anti-bribery and corruption. In particular, all employees must adhere to relevant laws in this area, including The Bribery act 2010.

The policy is also relevant for third parties who perform services for or on behalf of Ashton Scaffolding Services Ltd. We expect those persons to adhere to the Policy or have in place equivalent policies and procedures to combat bribery and corruption. The policy should be read in the context of a number of other measures that Ashton's has in place to ensure there is effective communication about anti corruption issues in connection with its business. These include:

Providing information to employees on anti-bribery issues

Additional steps to encourage all employees to be vigilant and to report any suspicion of bribery. In this regard, Ashton's promotes a number of channels of communication for employees to raise concerns as follows:

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Ashton Scaffolding Services Ltd will ensure any concerns are investigated and any employee making a report in good faith shall suffer no detriment for doing so.

Ashton Scaffolding Services Ltd will take firm action against any individuals or other parties that it discovers are involved in bribery. Any breach of the Policy by employees will result in disciplinary action under the Gross Misconduct provisions of Ashton's Disciplinary and Dismissal Procedures which can include the sanction of summary dismissal in any case where an employee has been found to have paid or received a bribe. Failure by any employee to report corrupt activity by other persons can also result in disciplinary sanctions, especially where there is evidence that an employee has attempted to cover up or disguise another wrongdoing.

The Policy:

Ashton Scaffolding Services Ltd has a zero-tolerance policy towards corruption of all kinds.

Employees should note that it is a criminal offence to offer, promise, pay, request or accept a bribe. A bribe does not need to be a monetary sum. It can be any form of advantage, offered or received

A contract does not need to have been won for a corruption offence to have been committed. Similarly, a recipient does not need to benefit personally from a bribe. Bribery can occur in the private or public sector.

The Policy consists of two straightforward rules that all employees must adhere strictly to:

Do not offer, promise or pay bribes.

Do not request, agree to or accept bribes.

The risks of corruption are not always obvious. Accordingly, employees should follow these principles:

Do not make payment to someone (or favour them in any other way) if you know that this will involve someone in misuse of their position (or them performing their functions improperly).

Do not misuse your position (or perform your functions improperly) in connection with payments (or other favours) for yourself or others.

Reasonable and Proportionate Gifts and Hospitality:

This policy is not meant to prohibit the giving or receiving of reasonable and proportionate gifts and hospitality subject to the following:

They are appropriate in all the circumstances and there is no risk or perception that they might improperly influence the recipient.

They do not contravene any rules applying to the individual to whom the hospitality or gift is offered (i.e any policy that another organisation has in place) or any laws applying to that other person.

The expenditure in question is not related in time to some actual or anticipated business with the recipient, particularly in a competitive context.

In case of hospitality provided or received, it is intended to foster cordial relations to have legitimate marketing purposes; and:

The level of hospitality is appropriate with regard to the recipient and their organisation.

There are no "add-ons" such as inappropriate overnight accommodation, travel costs, or sundry or lavish expenses.

In the case of gifts, these should never be cash and must be modest at all times, such as a token of appreciation on a festival or at another special time such as the opening of a development, completion of contract etc, and where there is no risk of them being misconstrued as a reward, an inducement or other corrupt act.

All offers of hospitality and gifts given or received must be recorded with senior management.

Seeking further guidance:

Inevitably, decisions as to what is acceptable may not always be easy. If any employee is in doubt as to whether a potential act could give rise to corruption concerns, the matter should be referred immediately to the senior manager with responsibility for this policy before proceeding.

Sponsorship and Charitable Donations:

All sponsorship and donations made on behalf of Ashton Scaffolding Services Ltd must be approved by senior management.

Facilitation Payments:

Facilitation payments are bribes and prohibited by this policy. They are typically small unofficial payments paid to speed up an administrative process. Where an employee (or someone acting on behalf of Ashton Scaffolding) suspects a demand for a payment is a request for a facilitation payment, this must be reported immediately.

Record Keeping:

Ashton Scaffolding Services Ltd must keep accurate financial and other records and have appropriate internal controls in place which will evidence the business reason for making payments to any third parties.

Responsibilities:

Employees must read or be read, understand and comply with this Policy.

Ashton Scaffolding has overall responsibility for ensuring that everyone complies with the policy.

Management are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate training on it.

Signed: P Farmer

Co. Director

July 2022