

Rubax Lifts Limited

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**RUBAX LIFTS LIMITED POLICY**

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Authorisations - This document requires the following authorisation from the below named individuals

Name:	Title:
Dave Verey	Managing Director

Anti-Bribery and Corruption

1 POLICY STATEMENT

Rubax Lifts is committed to conducting business honestly, fairly and with integrity. Rubax adopts a zero-tolerance approach to bribery, corruption, facilitation payments and improper inducements. We will comply with the Bribery Act 2010 and expect the same standards from employees, workers, contractors, suppliers, agents, consultants and any other person or organisation performing services for or on behalf of Rubax.

2 PURPOSE

The purpose of this policy is to define Rubax's position on bribery and corruption, set out responsibilities, and provide clear rules for preventing, identifying, reporting and managing bribery and corruption risks.

3 SCOPE

This policy applies to all Rubax directors, employees, temporary workers, agency workers, consultants, contractors, suppliers, subcontractors, agents, business partners and any associated persons acting for or on behalf of Rubax. It applies to all business activities, including tendering, procurement, contract management, site activities, customer engagement, gifts, hospitality, donations, sponsorship and charitable activity.

4 LEGAL CONTEXT

The Bribery Act 2010 establishes offences for offering, promising or giving a bribe, requesting, agreeing to receive or accepting a bribe, bribing a foreign public official, and failing by a commercial organisation to prevent bribery by associated persons. A commercial organisation may have a defence to the failure to prevent offence where it can demonstrate that adequate procedures were in place to prevent bribery.

The Ministry of Justice guidance identifies six principles for adequate procedures: proportionate procedures, top-level commitment, risk assessment, due diligence, communication including training, and monitoring and review.

5 DEFINITIONS

Bribery	Offering, promising, giving, requesting, agreeing to receive or accepting a financial or other advantage intended to induce or reward improper performance.
Corruption	Dishonest or fraudulent conduct, usually involving misuse of position, influence or authority for personal or business gain.
Associated person	Any person or organisation performing services for or on behalf of Rubax, including employees, subcontractors, consultants, agents and suppliers.
Facilitation payment	A small unofficial payment made to secure or speed up a routine action. These payments are not permitted.
Improper performance	Performance which breaches an expectation of good faith, impartiality or trust.

6 RESPONSIBILITIES

- The Managing Director has overall responsibility for promoting a culture where bribery and corruption are not tolerated
- The HSEQ Department is responsible for maintaining this policy, coordinating review and supporting communication and training
- Managers are responsible for applying this policy within their areas of control, including supplier and subcontractor engagement
- Employees and associated persons must comply with this policy, avoid conflicts of interest, and report any concerns immediately

7 POLICY REQUIREMENTS

Rubax personnel and associated persons must not:

- Offer, promise, give, request, agree to receive or accept a bribe, kickback, inducement or improper advantage
- Make facilitation payments, regardless of local practice or perceived business convenience
- Use gifts, hospitality, expenses, donations or sponsorship to improperly influence a decision
- Create or use unofficial accounts, slush funds, false invoices or inaccurate records
- Threaten, disadvantage or retaliate against anyone who raises a genuine concern

Rubax personnel and associated persons must:

- Act honestly and transparently in all business dealings
- Ensure expenditure is reasonable, proportionate, properly authorised and accurately recorded
- Declare any actual, potential or perceived conflict of interest
- Seek advice from a Director or the HSEQ Department where there is uncertainty

8 GIFTS, HOSPITALITY AND EXPENSES

Reasonable and proportionate hospitality may be acceptable where it is transparent, lawful, infrequent, business-related, not cash or a cash equivalent, and not intended to influence a decision improperly. Gifts and hospitality must never be offered or accepted during sensitive periods where this could create the appearance of influence, such as tendering, contract negotiation, supplier selection or dispute resolution.

Any gift or hospitality that could appear excessive, unusual, personal, frequent, linked to a business decision or capable of influencing impartiality must be declined or referred to a Director for approval. Records must be retained where approval is required.

9 CHARITABLE DONATIONS, SPONSORSHIP AND POLITICAL CONTRIBUTIONS

Charitable donations and sponsorship must be lawful, transparent, proportionate, properly authorised and recorded. They must not be used as a route to secure improper advantage. Rubax does not make political donations.

10 DUE DILIGENCE AND THIRD PARTIES

Rubax will take a proportionate, risk-based approach to due diligence before engaging third parties who may act for or on behalf of the company. Higher-risk relationships may require additional checks, contractual anti-bribery clauses, evidence of competence, monitoring or approval by senior management.

11 RISK ASSESSMENT

Bribery and corruption risks will be considered as part of governance, procurement, tendering and contract management activities. Risk assessment will take account of the nature of the work, value of the contract, customer or supplier relationship, use of intermediaries, gifts or hospitality, public sector interfaces, and any geographic or sector-specific concerns.

12 TRAINING AND COMMUNICATION

This policy will be made available to employees and communicated to relevant contractors, suppliers and business partners. Training and awareness will be proportionate to role and risk, including those involved in procurement, tendering, contract management, finance, customer relationships and supplier management.

13 REPORTING CONCERNS

Any suspected bribery, attempted bribery, request for an improper payment, facilitation payment, unusual gift or hospitality, conflict of interest or concern about third-party conduct must be reported promptly to a Director or the HSEQ Department. Reports may be made by email and should include relevant details and evidence where available.

Rubax will treat reports seriously and will not tolerate victimisation or retaliation against any person who raises a concern in good faith.

14 INVESTIGATION AND DISCIPLINARY ACTION

Reported concerns will be reviewed by Directors and, where necessary, legal or specialist advice will be obtained. Breach of this policy may result in disciplinary action, termination of contract, removal from approved supplier lists and/or referral to enforcement authorities.

15 RECORDS AND FINANCIAL CONTROLS

All transactions, gifts, hospitality, donations, sponsorship, expenses and approvals must be recorded accurately and retained in accordance with company procedures. False, misleading, incomplete or concealed records are prohibited.

16 MONITORING AND REVIEW

This policy will be reviewed at least annually and sooner where there are changes to legislation, organisational structure, business activities, contract risk, audit findings or reported incidents. Monitoring may include review of supplier controls, financial records, gifts and hospitality records, training evidence, incident reports and internal audit findings.