

### HAWKS CRANE HIRE LIMITED

# Anti-Bribery Policy and Procedures

## **Anti-Bribery Policy**

#### A) INTRODUCTION

Bribery is a criminal offence. The Company prohibits any form of bribery. We require compliance, from everyone connected with our business, with the highest ethical standards and anti-bribery laws applicable. Integrity and transparency are of utmost importance to us and we have a zero tolerance attitude towards corrupt activities of any kind, whether committed by employees or by third parties acting for or on behalf of the Company.

#### B) POLICY

It is prohibited, directly or indirectly, for any employee or person working on our behalf to offer, give, request or accept any bribe i.e. gift, loan, payment, reward or advantage, either in cash or any other form of inducement, to or from any person or Company in order to gain commercial, contractual or regulatory advantage for the Company, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.

#### **C) SUSPICION**

If we suspect that you have committed an act of bribery or attempted bribery, an investigation will be carried out and, in line with our disciplinary procedure where appropriate, action may be taken against you which may result in your dismissal, or the cessation of our business arrangement with you.

#### D) REPORTING

If you, as an employee or person working on our behalf, suspect that an act of bribery or attempted bribery has taken place, even if you are not personally involved, you are expected to report this to the Managing Director. You may be asked to give a written account of events.

Staff are reminded of the Company's Whistleblowing Policy which is available in this Employee Handbook.

#### E) GIFTS AND HOSPITALITY

We realise that the giving and receiving of gifts and hospitality as a reflection of friendship or appreciation where nothing is expected in return may occur, or even be commonplace, in our industry. This does not constitute bribery where it is proportionate and recorded properly.

No gift should be given nor hospitality offered by an employee or anyone working on our behalf to any party in connection with our business without receiving prior written approval from the Managing Director.

Similarly, no gift or offer of hospitality should be accepted by an employee or anyone working on our behalf without receiving prior written approval from the Managing Director.

#### F) RECORD KEEPING

A record will be made of every instance in which gifts or hospitality are given or received.

As the law is constantly changing, this policy is subject

### Record of Periodic Review of our Health and Safety Policy

Our Health and Safety General Policy Statement and Safety Arrangements **m**reviewed periodically. This is a record of these periodic reviews we have undertaken. Our Peninsula Health and Safety Consultant will also review our system and documentation during their routine visits to ensure that they meet current statutory requirements and good practice relevant to our business.

This record should be endorsed by all persons who carry out these periodic reviews (including Peninsula Health and Safety Consultants).

| DATE     | NAME OF REVIEWER(S) | <b>OUTCOME</b><br>(State – No change required or<br>explain any required changes) | Signature |
|----------|---------------------|---|-----------|
| 16/10/18 | Elliot Hawkins      | First Revision  | Edha      |
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