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Anti-corruption and Bribery policy

Bribery is defined as giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for having already done so, i.e. to seek to, or to actually influence a decision-maker by giving some kind of extra benefit to that decision-maker rather than by what can legitimately be offered as part of a tendering process.

We at R&M Commercials Ltd are aware of our responsibilities under the provisions of the *Bribery Act 2010* and have designated Martyn Powell as the nominated person to implement, review and update our policy and to ensure that all persons operating under and with the authority of R&M Commercials Ltd are fully aware of the provisions of the Act.

The company maintains a comprehensive list of all political and charitable contributions, gifts, hospitality and expenses made and received by its employees, staff, officers and directors.

The company strictly forbids any person or business operating under the authority of R&M Commercials Ltd from engaging in any form of bribery or corrupt conduct as defined under the Act. Failure to adhere to this instruction will invoke the company disciplinary procedure in addition to possible legal action.

The company requires any director, officer or employee to report to the nominated person any approach made to them – either directly or by a third party - to participate in any act that could be deemed as breach of the *Bribery Act*. The reporting of such an occurrence will be covered by the company's 'whistle-blowing' procedure. Failure to adhere to this instruction will invoke the company disciplinary procedure.

The company will take all reasonable steps to ensure that any company, agent, sub-contractor, supplier or any business that R&M Commercials Ltd engages with are fully aware of their responsibilities under the Act and can produce, on request, the documentary evidence of their own anti-corruption policy.

The company undertakes to comply with any action required by any professional body of which it is a member to verify its anti-corruption policy, as a requirement of its ability to carry out its main business function.

The company only operates within the UK, however it is aware that the operations carried out in the UK by overseas companies and operating outside of the EU may have less stringent laws. The company is aware of its duty of care in operating in these circumstances and will make every effort to ensure that the appropriate authorities are contacted to carry out a risk assessment of possible corrupt practices.