

We at MSL are committed to running our business free from discreditable behaviour of any kind and be known for our honesty and integrity. We refuse to offer, give or receive bribes of any nature to obtain or retain existing business or secure any improper advantage and we will not use or allow others to do such things for us.

We will never knowingly seek to gain advantage of any kind by acting fraudulently, deceiving people or by making false claims and we will not allow anyone else to do so on our behalf.

The Company has built its business to benefit its employees and our customers and we aim to encourage ethical and anti-bribery values to all employees of the company. Where we rely on the services of sub-contractors and consultants we would expect them to accept the terms of this policy or to have their own policy which sets out standards to match our own.

All employees of the company need to understand and recognise bribery and corruption so they can take the appropriate action to guard against it.

## ***Definition***

Bribery is the accepting of gifts, money, hospitality or other favours in return for providing something of value to the briber. The purpose of this policy is to set out the rules that must be followed in the company to ensure that bribery does not occur.

## ***Unacceptable Behaviour***

The following behaviour is unacceptable and must not occur within the company:

- Accepting any financial or other reward from any person in return for providing some favour
- Requesting a financial or other reward from any person in return for providing some favour
- Offering any financial or other reward to any person in return for providing some favour.

## ***Understanding specific areas of risk***

Bribery can be a risk in many areas of the construction industry:

- **Facilitation Payments** – Small payments or gifts made to speed up or “facilitate” actions that officials already are duty-bound to perform. We will not make facilitation payments.

There is one exception, where a payment is being extorted from an employee and they feel that their safety, or that of their family is at risk then they should make the payment. In these circumstances the company is duty bound to support the employee. The payment must then be reported directly to the Managing Director.

- **Reciprocal Agreements** – We will not participate in any form of collusion and we will not accept improper payments to obtain new business, retain existing business, or secure improper advantage.

- **False Claims** – We will never participate in the falsification of any claims.

- **Corrupt third parties** – We look to work with those who are willing to work to the conditions set out within our policy. Payments made to third parties should be properly authorised and recorded.

- **Gifts** – Gifts that are offered to an employee, however small, must be reported to the Managing Director and recorded. No gifts with a value of more than £50.00 may be accepted.

If a gift is offered and then refused because of its value, this must be reported to the Managing Director.

A copy of this Policy will be displayed on all premises under the Company's control and brought to the attention of all employees and others working for the Company.

## ***Organisation***

It is the responsibility of the Managing Director Justin Mylchreest to ensure that all objectives of this policy are met and upheld.

## ***Arrangements***

The following deals with how the responsibilities under 'organisation' will be carried out:

- The Company will monitor and review targets and objectives to ensure compliance with legal and other requirements

MSL is constantly striving to protect, so far as is reasonably practicable, the values of our employees and customers that may be affected by its operations. We recognise that the success of this Policy depends on the combined efforts of all individuals and to this end will fully support any individual encountering difficulties implementing this Policy.

Signed

**Justin Mylchreest – Managing Director**

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