



Maincare Roofing & Building Ltd

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Anti-Bribery and Corruption Policy

Maincare Roofing and Building Limited (The Company) is committed to an ethical, fair and honest business model and promotes acting professionally and with integrity in all business dealings and relationships.

The Company takes a zero-tolerance attitude to Bribery and Corrupt activities recognising that should our company, or anyone associated with us, be discovered to have engaged in such activities, we may be subjected to an unlimited fine, be excluded from tendering for public contracts, and face serious damage to our reputation. It is with this in mind that we commit to preventing bribery and corruption in our business and to taking our legal responsibilities seriously.

Definitions

Any kind of abuse of entrusted power in the workplace for private gain, taking the form of bribery, conflict of interest, fraud and/or money laundering.

A **bribe** refers to any inducement, reward, or object/item of value offered to another individual in order to gain commercial, contractual, regulatory, or personal advantage.

Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision.

Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law.

Bribery is illegal. Employees must not engage in any form of bribery, whether it be directly, passively (as described above), or through a third party (most bribery corruption involves a third party).

Legal

Bribery Act 2010 addresses everyone's responsibilities regardless of being at home, in the UK, or abroad. Bribery and corruption are statutory offences and are punishable by up to ten years of imprisonment and a fine.

Policy Rules

This anti-bribery policy applies to all employees (whether temporary, fixed-term, or permanent), consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, agents, sponsors, or any other person or persons associated with us (including third parties), no matter where they are located (within or outside of the UK). The policy also applies to Officers, Trustees, Board, and/or Committee members at any level.

In the context of this policy, third-party refers to any individual or organisation our company meets and works with. It refers to actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies – this includes their advisors, representatives and officials, politicians, and public parties.

Any arrangements our company makes with a third party is subject to clear contractual terms, including specific provisions that require the third party to comply with minimum standards and procedures relating to anti-bribery and corruption.

Everyone is equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this anti-bribery policy.

The Company accepts normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts meets the following requirements:

- It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits.
- It is not made with the suggestion that a return favour is expected.
- It is in compliance with local law.
- It is given in the name of the company, not in an individual's name.
- It does not include cash or a cash equivalent (e.g. a voucher or gift certificate) and is given openly, not in secrecy.
- It is appropriate for the circumstances (e.g. giving small gifts around Christmas or as a small thank you to a company for helping with a large project upon completion) and is appropriate to the circumstances.
- It is not given to a influential person, selectively identified with the intention of directly influencing them.
- Company Directors shall be informed and all gifts and hospitalities will be recorded in detail and accurately and will be subject to review at regular intervals by Directors.

Misconduct

Everyone must not accept bribes in any degree and if they are uncertain about whether something is a bribe or a gift or act of hospitality, they must seek further advice from the company's Directors.

If any employee, breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct.

The Company reserves the right to terminate a contractual relationship with an employee, and/or a third party if they breach this anti-bribery policy, potentially bringing the Company into disrepute and risking the future of the Company.

Concerns

Whilst the likelihood that workers of the Company will be exposed to this risk is negligible, the Directors of the Company do acknowledge that Bribery and Corruption in the Construction Industry is higher than other industries. Should any worker have any concerns, please advise the Directors immediately giving as much detail as possible.

You should contact the Directors immediately:

- Should you have concerns regarding the authenticity/reasons behind a gift or payment being received or be asked to make one.
- If you suspect bribery and corrupt activities are taking place in relation to the Company's business by others.
- If you have been approached to receive or to make any payments, gestures, hospitality with or without threat.

If you refuse to accept or offer a bribe or you report a concern relating to potential act(s) of bribery or corruption, Directors of the Company understand that you may feel worried about potential repercussions and will work with you to resolve the situation.

All concerns will be treated discreetly and confidentially by the Directors of the Company. The Company will support anyone who raises concerns in good faith under this policy, even if subsequent investigation finds that they were mistaken.

Equal Opportunity

Without prejudice, this policy will apply to all staff, employees equally and regardless of grade, experience or role within the company as well as third parties.

Signed: S Harvey

A handwritten signature in black ink, appearing to be 'S Harvey', with a horizontal line drawn through the middle of the signature.

Date: 05 April 2019