



Anti-Bribery and Corruption Policy

1. Introduction

The purpose of this policy is to outline the requirements of Compressed Air Solutions employees, directors, contractors, consultants and any other persons acting on behalf of the company, in relation to bribery and corruption. The policy also extends to any other persons or bodies associated with Compressed Air Solutions Ltd

Compressed Air Solutions Ltd values its reputation and is committed to maintaining the highest level of ethical standards in the conduct of its business activities. The actions and conduct of our staff and those acting on behalf of the company are crucial to maintaining these standards.

2. Relevant Legislation

The Bribery Act 2010 came into force on July 1st 2011. Punishment under the act can result in up to ten years imprisonment and/or unlimited fine. Where there is a lack of adequate prevention procedures, the company could also face an unlimited fine. A conviction for bribery or corruption related offences would result in serious damage to the company's reputation and/or financial consequences.

The Bribery Act 2010 broadly defines bribery as giving or receiving a financial or other advantage in connection with the "improper performance" of a position of trust, or a function that is expected to be performed impartially or in good faith. In simple terms, these acts are designed to incline an individual to act in a way that a reasonable person would consider to be dishonest.

Bribery does not have to involve cash or an actual payment exchanging hands and can take many forms such as:

- ✓ Excessive gifts, entertainment and hospitality
- ✓ Facilitation payments - used to secure or expedite the performance of a routine or necessary action to which the payer has an entitlement as of right)
- ✓ Reciprocal Agreements – improper payments accepted or made to obtain new business, retain existing business or secure an improper advantage
- ✓ Actions by third parties for which Compressed Air Solutions may be held responsible
- ✓ Record keeping can be exploited to conceal bribes or corrupt practises

Types of bribery that could be relevant to Compressed Air Solutions:

- ✓ bribery in order to secure or keep a contract;
- ✓ bribery to secure an order;
- ✓ bribery to gain any advantage over a competitor;
- ✓ bribery of a local, national or foreign official to secure a contract;
- ✓ bribery to turn a blind eye to a health safety issue or poor performance or substitution of materials or false labour charges;
- ✓ bribery to falsify an inspection report or obtain a certificate;

Corruption is deemed to be any form of abuse of entrusted power for private gain and may include, but is not limited to, bribery.

3. Compressed Air Solutions Policy

Compressed Air Solutions will not tolerate bribery or corruption in any form. The company prohibits the offering, giving, solicitation or the acceptance of any bribe or corrupt inducement, whether in cash or in any other form:

- *to or from* any person or company wherever located, whether a public official or public body, or a private person or company;
- *by* any individual employee, director, consultant, contractor or other person or body acting on the company's behalf;
- *in order to* gain any commercial, contractual, or regulatory advantage for the company in any way which is unethical or *to* gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.

This policy is not intended to prohibit the following practices provided they are appropriate, proportionate and are properly recorded:

- normal hospitality;
- fast tracking a process which is available to all on the payment of a fee; and/or;
- providing resources to assist a person or body to make a decision more efficiently, provided that it is for this purpose only.

It may not always be a simple matter to determine whether a possible course of action is appropriate. If you are in any doubt as to whether a possible act might be in breach of this policy or the law, the matter should be referred to Mark Scott (Managing Director) or Lisa Blockley (Company Secretary/Director).

Compressed Air Solutions will investigate thoroughly any actual or suspected breach of this policy, or the spirit of this policy. Employees found to be in breach of this policy may be subject to disciplinary action which may ultimately result in their dismissal.

Bribery can be a risk in any area of the company. The following are deemed acceptable by Compressed Air Solutions Directors:

- Gifts, entertainment and hospitality are acceptable provided they are not excessive and they are declared to the Directors.
- **Reciprocal agreements:** or any other form of '*quid pro quo*' are acceptable if they are legitimate business arrangements which are properly documented and approved by Compressed Air Solutions Directors.
- Third parties will only be engaged where there is a clear business rationale for doing so, with appropriate documentation. Any payments to third parties will be properly authorised by either Director and recorded.
- **Record keeping** is to be maintained accurately and transparently using the in-house designed and developed data base which has customer and equipment service details, stock records, supplier details, order details and purchase invoice details.

The prevention, detection and reporting of bribery or corruption is the responsibility of all Compressed Air Solutions employees. Should any employees become aware or suspect that an activity or conduct which is proposed or has taken place is a bribe or corrupt, then you have a duty to report this in accordance with the company Whistle Blowing Policy (outlined in the Employee Handbook).

This policy will be reviewed by the company Directors on an annual basis and disseminated to all employees electronically. Copies will be made available to all interested parties.



14th October 2021