

Anti-bribery Policy



Pickering's®

VERSION	AUTHOR	CHANGES	APPROVER	EFFECTIVE DATE
5.0	Mark Shepstone, HR Business Partner	Revised for conciseness.	Neil Moss, Managing Director 	31 st March 2025

1.0 INTRODUCTION

- 1.1 Pickerings Hire Ltd ("the Company") is committed to conducting business fairly, honestly and lawfully, and has a zero-tolerance approach to bribery.
- 1.2 The Company is bound by the laws of the UK, including the Bribery Act 2010 which governs its conduct both in the UK and worldwide and is committed to upholding all laws relevant to countering bribery in all jurisdictions it operates.

2.0 DEFINITIONS

- 2.1 A bribe is an inducement or reward of anything of value, including cash, gifts, hospitality, entertainment or donations, that are given, offered, requested, or promised to gain a commercial, contractual, regulatory or personal advantage, or to improperly influence a person's actions or decisions.

3.0 SCOPE

- 3.1 This policy applies to all persons working for the Company or on its behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.
- 3.2 This policy does not form part of any employee's contract of employment and may be amended at any time.

4.0 PRINCIPLES

- 4.1 Any person working for or on behalf of the Company is strictly prohibited from:
 - 4.1.1 Offering, or giving any payment, gift or hospitality with the expectation a business advantage will be given.
 - 4.1.2 Giving or offering a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a procedure.
 - 4.1.3 Accepting a payment, gift or hospitality from a third party that is offered with the expectation the third party will obtain a business advantage.
 - 4.1.4 Threatening or retaliating against, another person working for or on behalf of the Company who has refused to commit a bribery offence or who has raised concerns under this policy.
 - 4.1.5 Engaging in any other activity that breaches this policy.

- 4.2 The prevention, detection and reporting of bribery is the responsibility of everyone working for or on behalf of the Company. Any suspicion of bribery should be reported without delay.
- 4.3 Training on this policy, including how to identify and report unethical conduct and the consequences of bribery, forms part of the induction process for all individuals who work for the Company or on its behalf.
- 4.4 The Company's zero-tolerance approach to bribery will be communicated to all third parties it engages with along with the expectation they will also remain compliant with the Bribery Act.
- 4.5 The Company will ensure any legislative changes or Government led campaigns relating to preventing bribery are communicated to its employees and embedded into its policies as appropriate.
- 4.6 Any employee who breaches this policy will face disciplinary action, which could result in their dismissal. Equally the Company may terminate its relationship with other individuals and organisations working on its behalf if they breach this policy. Anyone breaching this policy may also find themselves subject to criminal prosecution.

5.0 THIRD PARTIES

- 5.1 The Company will conduct appropriate due diligence on all third parties, such as agents, contractors and business partners to ensure they are not involved in any form of bribery.
- 5.2 The Company will seek assurance from any third party it conducts business with that they share the same commitment to preventing bribery occurring.
- 5.3 Third parties who do not have their own Anti-Bribery policy will be expected to declare their acceptance and ongoing adherence to the Company's Anti-Bribery Policy.
- 5.4 The Company may terminate its relationship with any third party if it is identified any bribery has been attempted by them or has occurred in their wider business dealings.

6.0 GIFTS & HOSPITALITY

- 6.1 The Company does not disallow the giving or receiving of gifts and hospitality and recognises this can play an important role in building goodwill and enhancing relationships with third parties with whom the Company has business dealings.
- 6.2 Gifts and hospitality should be occasional and proportionate to the Company's business relationship with the third party and never given or received to create an entitlement to preferential treatment, an award of business, better prices, improved service or to influence any other business decision.
- 6.3 Approval must be sought from the Finance Director, before any gift or hospitality is procured and offered to a third party.
- 6.4 All gifts and hospitality offered by a third party to an individual working for the Company, must be declared to a senior manager to confirm their acceptability. The exception to this is gifts of a nominal value, such as promotional items.

- 6.5 The senior manager will decide if it appropriate for the individual to keep the gift or hospitality, or whether it should be shared amongst colleagues or become a raffle prize or charitable donation. Where a gift or hospitality is exceptionally extravagant and given without a strong business justification, it should be returned.

7.0 FACILITATION PAYMENTS & KICKBACKS

- 7.1 Facilitation payments are typically unofficial payments made to secure or expedite a routine government action by a government official.
- 7.2 Kickbacks are typically payments made in return for a business favour or advantage.
- 7.3 The Company will not make facilitation payments or kickbacks of any kind. Anyone working for or on behalf of the Company must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by the Company
- 7.4 Anyone working for or behalf of the Company who is asked to make any payment on behalf of Company must always ask for an invoice and detailed reasons for the payment. Any suspicions, concerns or queries regarding a payment, must be raised with a senior manager.

8.0 RECORD KEEPING

- 8.1 The Company will maintain accurate and complete records of all financial transactions, gifts, and hospitality offered or received to demonstrate compliance with this policy.

9.0 CHARITABLE DONATIONS

- 9.1 The Company will occasionally make donations to charities or other organisations however no such donation will be with the intention of gaining a business advantage.
- 9.2 No-one working for or on behalf of the Company should offer or make a charitable donation on behalf of the Company without obtaining prior approval from the Finance Director.

10.0 RAISING CONCERNS

- 10.1 Anyone working for the Company or on its behalf, who is offered a bribe, is asked to make one, or suspects an act of bribery has or may occur, must report this immediately to a Senior Manager or through the Company's Whistleblowing Policy.
- 10.2 Individuals who have been threatened or retaliated against for raising concerns about possible breaches of this policy, should report this to a senior manager or in accordance with the Company's Grievance Policy.
- 10.3 Any reported suspicions of bribery will be handled in strict confidence, and no-one will suffer any detrimental treatment for making such a report in good faith even if it turns out to be mistaken.