

## **ANTI BRIBERY and CORRUPTION POLICY (The Bribery Act 2010 (as amended))**

We at Magnus Electrical Services Ltd refuse to offer give or receive bribes, improper payments. Directly or indirectly through third parties participate in any kind of corrupt activity.

The most prevalent forms of bribery and corruption stem from:

- Payments to an organisation's employees or their connected persons, or to those of a third party, to secure advantage in business transactions
- Political contributions made to secure advantage in business transactions
- Charitable sponsorships used to secure advantage in business transactions
- Facilitation payments or other benefits made to secure or accelerate routine or necessary business actions
- Gifts, hospitality and expenses payments made to secure advantage in business transactions
- Provision of favours to public officials other than through normal business procedures
- Uncompensated use of company services, facilities or property
- Provision of training and associated travel, accommodation and living costs to public officials
- Conflicts of interest where staff or management may hold an interest which may provide a business advantage to the Company

### **Policy**

Magnus Electrical Services Ltd prohibits employees (whether acting in their own capacity or on the Company's behalf) from:

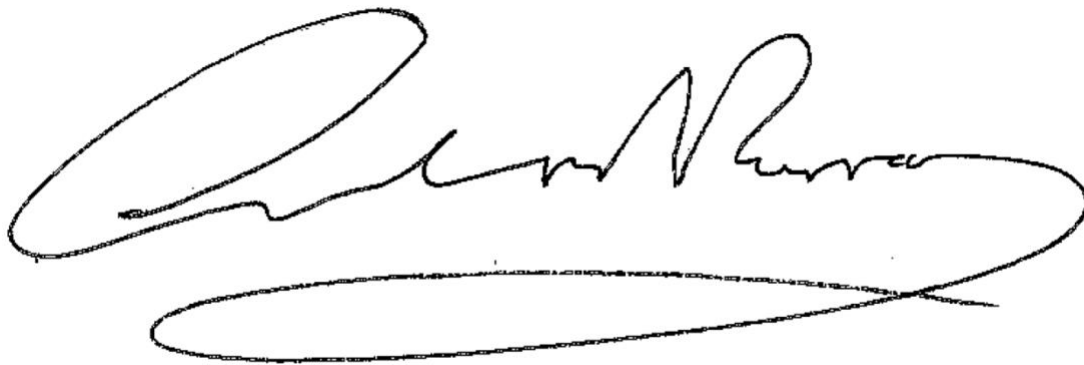
- Offering, promising, giving, paying or authorising, directly or indirectly, any bribe, facilitation payments or other benefits to or for the benefit of any person (whether in private or public office) in order to obtain any improper business advantage or other advantage for the Company or themselves or any of their connected persons
- Soliciting, accepting or receiving (whether for the Company's benefit, their own benefit or the benefit of any connected persons) any bribe, facilitation payment or other benefit from any person (whether in private or public office) in return for any improper business or other advantage
- Otherwise using illegal, unethical or improper means (including bribes, favours, blackmail, financial payments, inducements, secret commissions or other rewards) to influence the actions of others (whether in private or public office)
- Acting as an intermediary for any third party (private or public) in the solicitation, acceptance, receipt, offering, promising, giving, paying or authorising of any bribe, facilitation payments or other kickbacks or otherwise in the use of illegal, unethical and improper means to influence the actions of others (whether in private or public office)
- Falsifying records to obscure any actions which may not be in accordance with this Policy.

Staff are required to declare any conflicts of interest or potential conflicts of interest.

The Magnus Electrical Services Ltd Bribery Policy will be communicated to all employees who are required to comply fully with this policy and the Police will be contacted if the Policy is breached. Training will be given to all personnel and updated on a regular basis.

It is very important that employees take steps to ensure that the terms of this policy are complied with by third party service suppliers (which for these purposes includes consultants, agents, brokers, lobbyists, lawyers, tax advisers and other professionals) acting on the Company's behalf, as Magnus Electrical Services Ltd may incur criminal or civil liability where such service providers make unlawful payments or use illegal, unethical or improper means in the course of their work on behalf of the Company.

- They must follow the anti-bribery and corruption laws to which they and Magnus Electrical Services Ltd) are subject to UK anti-bribery and corruption laws apply wherever they are operating.
- They are liable to disciplinary action, dismissal, legal proceedings and possibly imprisonment if they are involved in bribery and corruption.
- They must ensure people who work for and with them understand bribery and corruption is unacceptable.
- They must comply with company procedures for the prevention of bribery and corruption.
- Employees must declare and keep a record of hospitality or gifts accepted or offered, which will be subject to managerial review.
- We do not make direct or indirect contributions to political parties.
- We will uphold laws relevant to countering bribery and corruption in all the jurisdictions in which we operate, particularly laws that are directly relevant to specific business practices.
- **Books and records** – We will maintain adequate books and records which properly and fairly document all financial transactions. We will maintain written evidence to record compliance with this policy.



**Colin Murray**  
**Managing Director**  
**Date: 18 December 2020**  
**Next Review Date: December 2021**