



Power Lines, Pipes and Cables Ltd (PLPC Ltd) are committed to the highest of ethical standards in the conduct of its business activities. This policy sets out our commitment to the prevention and prohibition of corruption and bribery by any officer, employee or agent of the company in relation to any business activity undertaken for or on behalf of PLPC. This policy will be supplemented by supporting business procedures including financial operating procedures.

We are committed to implementing and enforcing effective systems to counter bribery. Therefore, it is the Company's policy to always conduct all aspects of its business in an honest and ethical manner. This policy applies to all individuals working for the Company, including anyone providing services to the Company such as consultants, or contractors.

The aim of this policy is to help the Company act in accordance with the Bribery Act 2010, maintain the highest possible standards of business practice, and advise individuals of the Company's 'zero-tolerance' to bribery.

Under UK law, bribery and corruption is punishable for individuals by up to ten years imprisonment. If PLPC are found to have taken part in the corruption or lack the adequate procedures to prevent Bribery, unlimited fines and exclusion from Government contracts should be expected.

No company officer, employee or agent may offer payments (or anything else of value) to a government or client official to make that official act in a manner that may assist PLPC in obtaining or retaining business or securing any improper business advantage. PLPC takes bribery and corruption very seriously, and any officer or employee found to be violating this policy will be subject to disciplinary action, which may include summary dismissal.

This policy applies to all permanent and fixed-term staff employed by the Company, and any contractors, suppliers, consultants or other persons acting under or on behalf of the Company.

PLPC Responsibility

PLPC will not:

- Make contributions of any kind with the purpose of gaining any commercial advantage
- Provide gifts or hospitality with the intention of persuading anyone to act improperly, or to influence a public official in the performance of their duties
- Make, or accept, "kickbacks" of any kind

PLPC will:

- Keep appropriate internal records that will evidence the business reason for making any payments to third parties
- Encourage employees to raise concerns about any issue or suspicion of malpractice at the earliest possible stage in accordance with Procedure MSP 25 - *Whistleblowing*
- See that anyone raising a concern about bribery will not suffer any detriment as a result, even if they turn out to be mistaken
- Work with key suppliers to communicate the company's zero tolerance approach to bribery and corruption

Employee Responsibility

Employees must not:

- Accept, request or offer any financial or other reward, from any person in return for providing some favour

Employees must:

- Report any suspicions of malpractice in accordance with procedure MSP 24 – *Whistleblowing*

Bribery/ Intimidation

PLPC prohibits bribery or intimidation in any form. Bribery is the direct or indirect offer, promise, giving, acceptance or solicitation of a financial or otherwise valuable gift that may result or results in an activity being performed improperly (for example the awarding of a contract). The bribery act may involve the offer or receipt of a financial or otherwise valuable gift.

Gifts, Entertainment and Hospitality

PLPC recognises that fostering good relationships with business partners is important to its continued success. The provision and receipt of modest gifts and entertainment are acceptable in principle, provided that they are reasonable and made transparently.

However, the provision or receipt of any gift or entertainment, or the incurring of any expenses, is not permitted where it is offered or received in exchange for a business or other improper benefit that may create any sense of “obligation” to or from a third party, influences (or could influence, in any way) business judgement or creates (or may create) a conflict between a person’s personal interests and those of PLPC.

Any activity that could be perceived as having any of the above effects is also prohibited. PLPC’s business decisions and those of its partners must be made and be seen to be made objectively and without influence by gifts or favours. Relevant Persons may only offer or accept corporate or personal gifts of a modest value. In all circumstances, gifts, entertainment and other expenditure must be subject to an appropriate disclosure process and gifts, entertainment and expenditure above a specified value must be subject to an appropriate (prior) approval process.

This policy does not prohibit giving and receiving promotional gifts of low value, or normal and appropriate hospitality.

Receiving Business gifts:

- Receiving promotional gifts of low value is normal and appropriate. However, gifts with a value exceeding £25.00 may not be accepted without approval. Any gift offered and then refused because of its value, must be reported to the Managing Director.

Offering Business gifts:

- Business gifts are primarily aimed at thanking our customers and suppliers for their custom and loyalty, only authorised gifts may be given.

Receiving Hospitality:

The acceptance of corporate hospitality must be transparent. All invitations must be reported to the Managing Director before an employee accepts any invitation. The following areas are exempt while attending conferences, seminars, sponsored by third parties:

- business and travel expenses incurred
- normal business lunches and meals

Offering gifts and hospitality:

- Company hospitality is primarily aimed at thanking customers and suppliers for their custom and loyalty. All hospitality events must have approval.

Donations to organisations:

- No donations should be made to charities, political parties or other organisations without approval.

Third parties

PLPC are aware that the company's reputation may be damaged by the conduct of third parties acting on its behalf or by others with which it does business. In certain circumstances, their actions can have legal implications for Actavo. As such, it is not acceptable for a third party acting on PLPC's behalf to act in a way which would breach this policy were the act in question undertaken by Actavo directly.

Interaction with government officials

PLPC does not offer, promise or provide any financial or other advantage or otherwise seek to exercise improper influence in its relations with government or public officials in order to obtain any improper advantage directly or indirectly through intermediaries or other third parties.

Charitable contributions and sponsorships

PLPC makes charitable contributions and offers sponsorships for the purposes of socio-economic development or linked to cultural or sporting activities and not for improper business purposes.

Political donations

PLPC does not participate directly or indirectly in party politics and does not make payments to political parties, politicians or related organisations. PLPC respects the right of employees and other persons to participate in the political process. When pursuing such activities, employees and agents of PLPC must ensure that their views are not identified as those of PLPC.

Conflict of interest

Relevant Persons must avoid conflicts of interest and are expected to perform their duties conscientiously, honestly and in accordance with the best interests of PLPC. Relevant Persons must not abuse their position, misuse confidential knowledge for personal or third-party gain, or have any direct involvement in any business interest which diverts their attention from, or is in conflict with, PLPC's commercial interests, or which in any way compromises their independence and impartiality.

Whistleblowing

PLPC has a Whistleblowing Policy in place which is highlighted to employees on a regular basis. PLPC encourages all its workers to raise concerns or disclose information which relates to wrongdoing, illegal practices or unethical conduct, which may come to their attention through work. PLPC's whistleblowing procedure is designed to make it easy for workers to make disclosures without fear of retaliation. Employees who have concerns can use our confidential helpline/raise them confidentially via our dedicated email address. Please refer to MSP25 Whistle Blower Procedure for more information.

Non-Compliance

Where the above is not observed the following will apply where appropriate.

Staff: Failing to observe Company policy may lead to disciplinary action in accordance with the Company's Disciplinary Policy.

Visitors: In the event of a breach of the policy by other organisations, or individuals, the Company will take appropriate action.

Enforcement

Any person found to have violated this policy may be subject to disciplinary action, up to and including summary dismissal. The company will also involve Police as appropriate.

Definitions

Bribe is a financial or other advantage offered or given to anyone to persuade them to or reward them for performing their duties improperly, or, with the intention of influencing them in the performance of their duties.

Hospitality is the practice of being hospitable, this includes the reception and entertainment of guests / visitors.

Kickbacks or facilitation payments are typically small payments made in return for a business favour or advantage.

Reviewing Policy

This policy will be reviewed and, if necessary, revised in the light of legislative or organisational changes. Improvements will be made by learning from experience and the use of an established annual review.

Policy Amendments

Should any amendments, revisions, or updates be made to this policy it is the responsibility of the Company's Managing Director to see that all relevant employees receive notice. Written notice and/or training should be considered.

Monitoring, Evaluation and Review

The policy will be reviewed on an annual basis as part of the annual review of the ICT and Business Rules policies and procedures.

Monitoring the policy is essential to assess how effective the Company has been to establish control of its obligations. It will be monitored by PLPC on an on-going basis to ensure that it addresses issues effectively.

The following will be observed:

- That all individuals working for the Company are advised of the policy.
- Assessment of any reported incident or related occurrence.

It is the responsibility of all employees, visitors, suppliers and contractors to fully support this policy through their active participation and co-operation.

This policy will be displayed at our Carlisle office and on the company website, with distribution to customers, suppliers or any person, group or organisation on request.

Signed:



Dale Harrison
Managing Director

Last Reviewed: April 2025
Next Review Date: April 2026