

ANTI BRIBERY POLICY

Power Lines, Pipes and Cables Ltd (PLPC Ltd) is a family run business that was established in 1973 to provide a power line construction service to Distribution Network Operators (DNO) across the UK. PLPC Ltd supply and install overhead power lines and fibre optic systems to DNOs and private clients.

We are committed to implementing and enforcing effective systems to counter bribery. Therefore, it is the Company's policy to conduct all aspects of its business in an honest and ethical manner at all times. 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.

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*

Gifts and Hospitality

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.

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.

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 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, and contractors to fully support this policy through their active participation and co-operation.

This policy will be displayed at our Carluke 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: May 2022

Next Review Date: May 2023

