Anti-Bribery and Corruption Policy

1. About this policy

1. ABERCOL LTD is dedicated to conducting all business operations in an honest, ethical, and bespoke manner. We have a zero-tolerance approach towards bribery and corruption, and we are committed to upholding professionalism, fairness, and integrity in all our business dealings and relationships.
2. Any employee found in violation of this policy will be subject to disciplinary action, which may include termination for gross misconduct. Non-employee individuals who breach this policy may have their contracts terminated immediately.
3. This policy is not a contractual provision for any employee and may be modified at our discretion. Regular reviews will be conducted to ensure its effectiveness.

2. Who must comply with this policy?

1. This policy applies to all individuals working directly or indirectly for ABERCOL LTD, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners

3. What constitutes bribery?

1. Bribery refers to any financial or other inducement or reward for actions that are illegal, unethical, breach of trust, or improper in any way. Bribes can take various forms such as money, gifts, loans, fees, hospitality, services, discounts, contract awards, or any other advantage or benefit.
2. Bribery encompasses offering, promising, giving, accepting, or seeking a bribe.
3. All forms of bribery are strictly prohibited. If you are uncertain whether a particular act constitutes bribery, please discuss it with your line manager or Director.
4. Specifically, you must not:

4. Give or offer any payment, gift, hospitality, or other benefit with the expectation of receiving a business advantage in return or as a reward for business received.

Email. TeamAbercol@Abercol.co.uk
Phone. +44 (0)1785 472 620
Address. Melville St. Stoke-On-Trent, ST1 3LY

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5. Accept any offer from a third party if you know or suspect that it is made with the expectation of obtaining a business advantage for them or anyone else.

6. Give or offer any payment (sometimes referred to as facilitation payments) to government officials in any country to expedite routine or necessary procedures.

7. Gifts and hospitality

1. This policy does not prohibit the giving or accepting of reasonable and appropriate hospitality for legitimate purposes, such as building relationships, maintaining our image or reputation, or marketing our products and services.
2. Gifts or hospitality are deemed inappropriate if they are excessively lavish or extravagant, or if they could be viewed as an inducement or reward for preferential treatment (e.g., during contractual negotiations or a tender process).
3. Gifts must be of an appropriate type and value, considering the circumstances and the purpose of the gift. Cash or cash equivalents (such as vouchers) should not be included, and gifts should be given in the name of ABERCOL LTD, not your personal name.
4. Promotional gifts of nominal value, such as branded stationery, may be given to or received from existing customers, suppliers, and business partners.

8. Record-keeping

1. It is mandatory to document and keep a written record of all hospitality or gifts given or received. Additionally, all expenses claims related to hospitality, gifts, or payments to third parties must be submitted following our expenses policy. The reason for the expenditure should also be recorded.
2. All accounts, invoices, and other records pertaining to dealings with third parties, including suppliers and customers, must be accurately and thoroughly prepared. Off-book accounts should not be maintained to facilitate or conceal improper payments.

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9. Reporting concerns

If you are offered a bribe, asked to make one, or suspect any instances of bribery, corruption, or other breaches of this policy, you are required to immediately notify your manager or the company director.

Signed:



Colin Phillip – Managing Director

Date:09/02/2023 - Policy review date: 09/02/2024

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