



SMITH & SONS (BLETCHINGTON) LTD

ANTI BRIBERY POLICY STATEMENT

INCLUDING LINEAR FISHERIES (OXFORD) LTD

Bribery is, in the conduct of the company's business, the offering or accepting of any gift, loan, payment, reward or advantage for personal gain as an encouragement to do something which is dishonest, illegal or a breach of trust.

Bribery is a criminal offence. The Company prohibits any form of bribery. We require compliance, from everyone connected with our business, with the highest ethical standards and anti-bribery laws applicable. Integrity and transparency are of utmost importance to us, and we have a zero-tolerance attitude towards corrupt activities of any kind, whether committed by Smiths employees or by third parties acting for or on behalf of Smiths.

Purpose

The purpose of this Policy is to convey to all employees and interested parties of Smiths the rules of the Company in relation to our unequivocal stance towards the eradication of bribery and our commitment to ensuring that Smiths conducts its business in a fair, professional, and legal manner.

Offences

It is a criminal offence to:

- Offer a bribe
- Accept a bribe
- Bribe a foreign official
- As a commercial organisation, to fail to prevent a bribe.

You should be aware that if you are found guilty by a court of committing bribery, you could face up to 10 years in prison and/or an unlimited fine. The Company could also face prosecution and be liable to pay a fine

Definitions of Bribery and Corruption

Corruption is the misuse of office or power for private gain. Bribery is a form of corruption which means in the course of business giving or receiving money, gifts, meals, entertainment or anything else of value as an inducement to a person to do something which is dishonest or illegal.

This Policy applies to all employees and any person working on behalf of Smiths.

It is prohibited directly or indirectly, to offer, give, request or accept any bribe i.e. gift, loan, payment, reward or advantage, either in cash or any other form of inducement, to or from any person or company in order to gain commercial, contractual or regulatory advantage for the company, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that unethical.

If you, as an employee or person working on our behalf, suspect that an act of bribery, or attempted bribery, has taken place, even if you are not personally involved, you are expected to report this to your line manager where you will be asked to give a written account of events.

The Company will ensure that all its transactions, including any sponsorship or donations given to charity, are made transparently and legitimately.

Smiths takes any actual or suspected breach of this policy extremely seriously and will carry out a thorough investigation should any instances arise.

We will uphold laws relating to bribery and will take disciplinary action against any employee, or other relevant action against persons working on behalf or in connection with us, should we find that an act of bribery, or attempted bribery, has taken place. This action may result in dismissal if you are an employee, or the cessation of our arrangement if you are a contractor.

Gifts and Hospitality

We realise that the giving and receiving of gifts and hospitality where nothing is expected in return helps form positive relationships with third parties where it is proportionate and properly recorded. This does not constitute bribery and consequently such actions are not considered a breach of this policy.

Gifts include money, goods (flowers, vouchers, food, drink, event tickets (when not used in a hosted business context) services given or received as a mark of friendship or appreciation.

Hospitality includes entertaining; meals or event tickets (when used in a hosted business context) given or received to initiate or develop relations.

No gift should be given nor hospitality offered by an employee or anyone working on our behalf to any party in connection with our business without receiving prior written approval from the Senior Management Team. Similarly, no gift nor offer of hospitality should be accepted by an employee or anyone working on our behalf without receiving prior written approval from the Senior Management Team.

A record will be made of every instance in which gifts or hospitality are given or received.

As the law is constantly changing, this policy is subject to review and the company reserves the right to amend this policy without prior notice.

APPROVED BY: Ric Clemmey

DATE: 30/05/2024

REVIEWED BY: Ann Marie Paddock

DATE: 30/05/2024

Review Date: May 2025