

## Anti-Bribery and Corruption Policy Statement

01.12.2019

Manning Construction Limited is committed to the implementation and enforcing of an effective system to counter bribery and corruption. It is the intention of Manning Construction Limited to conduct all aspects of its business in an honest and ethical manner.

Under the UK Bribery Act 2010, bribery and corruption is punishable for individuals by imprisonment. If Manning Construction Limited is found to have participated in any bribery or corruption or is found to have insufficient policies or procedures in place to prevent any bribery or corruption, it could be faced with a fine of an unlimited amount and be excluded from tendering for any future contracts.

### Policy

The aim of this Policy is to help Manning Construction Limited ensure that all of its business activities comply with the Bribery Act 2010 and to ensure that all employees are aware of their role to help maintain the highest of standards of business practice and ensure that the companies 'Zero Tolerance' approach to bribery and corruption is met.

This Policy applies to all employees of Manning Construction Limited whether they are permanent, fixed-term staff, contractor, associate, or any person acting on the behalf of Manning Construction Limited.

As a company Manning Construction Limited will not make:

- Any contribution / donation of any kind with the intention of trying to gain any commercial advantage.
- Provide any gifts, hospitality or sweeteners with the intention of trying to get anyone to act improperly or influence a public official in the pursuance of their duties.
- Make or receive any 'kickback' of any kind.

### Company responsibilities

Manning Construction Limited will:

- Keep all appropriate internal records of any business transactions that are made to third parties and that sufficient evidence is kept as to the reasons for the payments.
- Encourage all employees to report any suspicions they may have about malpractice or the suspicion of any bribery or corruption.
- Make sure that anyone reporting suspected bribery or corruption will not receive any detrimental results for doing so, even if they are found to be wrong.

### Employee Responsibilities

All employees of Manning Construction Limited:

- Will not make any bribes or offer favours for the purpose of securing business opportunities.
- Will not accept any bribes or favours for the purpose of securing business opportunities
- Will report any attempt by a third party to bribe or offer favours with the purpose of trying to secure business opportunities.
- Must report all gifts offered / received on the appropriate form.

### Non-Compliance

All staff and associated persons of Manning Construction Limited have a vital role to play in the anti-bribery and corruption of all business functions of Manning Construction Limited. All staff and associated persons of Manning Construction Limited have a vital role in the enforcement of the company's policy and as such must do their best to ensure it is upheld. If a person feels

## **Manning Construction Ltd Anti-Tax Evasion Policy**

that they cannot deal with the situation it must be reported to their line manager immediately so it can be addressed.

Failure to comply with this policy is seen as a severe breach and will be dealt with under the company's discipline policy.

### Implementation of the Policy

It is the responsibility of the Managing Director to ensure that this Policy is implemented and followed in a consistent and professional manner. However, all employees of Manning Construction Limited and any person acting on behalf of Manning Construction Limited has a responsibility to ensure that they uphold the Policy and report any issues encountered.

Our policy is available to all persons working on behalf of Manning Construction Limited, shall be reviewed annually in line with the issue date, and will be made available to interested parties upon request.



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**Mr. Stephen Euston**  
Managing Director