

RJ Power Connections Limited has a policy of conducting all its business in an honest and ethical manner.

The Company takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships wherever it operates, and to implementing and enforcing effective systems to counter bribery.

We recognise that giving and accepting gifts, to and from third parties, can be part of building normal business relationships. However, some gifts and hospitality can create improper influence and conflicts of interest. In some instances, they can be viewed as bribes that could damage the Company’s reputation or even break the law.

RJ Power Connections will uphold all laws relevant to countering bribery and corruption and is bound by the laws of the UK, including the Bribery Act 2010, in respect of its conduct both at home and abroad. In accordance with this legislation, all those working for or on behalf of the company should follow the guidance outlined below:

- Inform a Director of any hospitality valued at more than £100 or individual gift valued at more than £50;
- Employees and employees’ families should refuse to accept gifts or hospitality which could influence or appear to influence decisions they make on behalf of the Company;
- Acceptance and / or offer of small gifts such as flowers, and/or casual hospitality such as business lunches, is acceptable within reasonable bounds, if it is a normal and appropriate expression of business courtesy;
- Employees must ensure that offering or accepting a gift or hospitality does not create or appear to create a conflict of interest for those involved;
- Employees should make a Director aware of all offers or acceptance of gifts or hospitality. If there is any doubt about the propriety of accepting a gift or hospitality, it should be refused;
- The primary responsibility for deciding whether gifts or hospitality should be accepted lies with you;
- The offer or acceptance of all gifts or hospitality must be fully documented and approved by a Director.

This policy applies to all individuals working for or on behalf of RJ Power Connections Limited, at all levels and grades within the organisation. RJ Power Connections recognises that bribery and corruption is punishable for individuals by up to ten years' imprisonment and if the Company is found to have taken part in corruption it could face an unlimited fine, be excluded from tendering for public contracts and face damage to its reputation.

The Company therefore takes its legal responsibilities very seriously and will endeavour to prevent, detect and encourage staff to report any activity that they believe may contravene this policy.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct.

This policy will be reviewed annually and revised as often as may be deemed appropriate by RJ Power Connections Limited and then communicated and explained to all employees and sub-contractors.

This policy is available to the public and all other interested parties on request.

**Signed:**



**Glenn Rowatt**

Managing Director – RJ Power Connections Limited

**October 2019**

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