

## **BRIBERY AND CORRUPTION POLICY.**

**(in compliance with The Bribery Act 2010)**

As a leading company within the Construction Industry, M J Church recognises its responsibilities in order to carry out our business activities.

**The Challenge**-Corruption, bribery, business misconduct and ethical dilemmas can take many forms. M J Church Ltd recognises the potential risk that corrupt practices pose to the company as well as the long term adverse impacts on the society where it takes place.

**Code of Conduct**-Behind the company's Code of Conduct are two key beliefs:

1. Uncompromising integrity – 'staying true to what we believe'
2. Constant respect for people – 'treating others as we would like to be treated ourselves'

**Policy**:-Anti-corruption principles feature as part of this Code of Conduct and are also detailed in Contracts of Employment as follows:-

**Suppliers**: -Will conduct their business without engaging in any corrupt practices these must include public or private bribery or "kickbacks" Suppliers will maintain integrity, transparency and accuracy in corporate record keeping.

**Gifts**: -Employees will not accept lavish gifts or gratuities, only gifts of a small nominal value. 'Kickbacks' are also outlawed (that is, the return of a percentage of a sum of money already received, typically as a result of pressure, coercion, or a secret agreement.)In giving gifts, sign off must first be obtained by management

**Entertainment**: -It is accepted that is reasonable in the context of business, as in the case of attendance at a local cultural event or meal. Where the entertainment is lavish, frequent and may appear to influence judgement, the offer must be turned down or full payment for the entertainment taken on by M J Church Ltd.

**Family relationships and close personal relationships**: -Nepotism is a commonly cited feature of corruption. M J Church Ltd makes it explicit that personal influence must not play a factor in securing business for the company where friends and family have an interest.

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our dealings wherever we operate. We are also committed to implementing and enforcing effective systems to counter bribery.

This policy applies to all individuals working at all levels and grades, including senior managers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, and any other person providing services to us.

A 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;
- to any public official with the intention of influencing the official in the performance of his duties.

This policy does not prohibit giving and receiving promotional gifts of low value and normal and appropriate hospitality. However, in certain circumstances gifts and hospitality may amount to bribery and all employees must comply strictly with the company ethics policy in respect of gifts and hospitality. We will not provide gifts or

hospitality with the intention of persuading anyone to act improperly or to influence a public official in the performance of his duties.

We do not make, and will not accept, facilitation payments or “kickbacks” of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. Kickbacks are typically payments made in return for a business favour or advantage. All employees must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.

We do not make contributions of any kind to political parties. No charitable donations will be made for the purpose of gaining any commercial advantage.

We will keep financial records and have appropriate internal controls in place which will evidence the business reason for making any payments to third parties.

All expense claims relating to hospitality, gifts or expenses incurred to third parties must be submitted in accordance with our expenses policy and specifically record the reason for the expenditure.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, must be prepared and maintained with strict accuracy and completeness. No accounts must be kept “off-book” to facilitate or conceal improper payments.

Employees will be encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. No employee will suffer any detriment as a result of raising genuine concerns about bribery, even if they turn out to be mistaken.

The effectiveness of this policy will be regularly reviewed by the Board.

Internal control systems and procedures will be subject to audit under the internal audit process.

It is for every manager, employee and persons working on our behalf to promote and encourage compliance with this policy and to respond to any training issue or discuss any possible improvements or requirements. This policy will be periodically reviewed and amended if required, to ensure its effectiveness and the performance monitored.

**For & on behalf of M J Church**



**S.P. Blower.**  
**Managing Director**

Last reviewed: April 2015