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## Anti-Bribery and Corruption policy

### Introduction

At Joe Roocroft & Sons Ltd we appreciate the importance of ethical behaviour to our relations with customers and suppliers and we are proud of our ethical standards, but we cannot be complacent about the threat of bribery and corruption in our business. Our first business principle deals with 'integrity in corporate conduct' which commits us to implement anti-corruption policies and procedures. Our second business principle 'ensuring openness and transparency' commits us never to engage in bribery, any form of unethical inducement or payment including facilitation payments and 'kickbacks'. This policy is part of those commitments.

The UK Bribery Act 2010 creates offences and penalties for bribery and corruption. The UK Bribery Act 2010 creates a corporate offence of failure to prevent bribery, and requires Joe Roocroft & Sons Ltd to implement 'adequate procedures' to prevent bribery.

This policy sets out the responsibilities of Joe Roocroft & Sons Ltd people in preventing bribery and corruption and how we will implement 'adequate procedures' to do so.

In developing this policy reference has been made to Transparency International's 'Business Principles for Countering Bribery'.

### Definition

For the purposes of this policy, bribery occurs when one person offers, pays, seeks or accepts a payment, gift, favour, or a financial or other advantage from another to influence a business outcome improperly, or to induce or reward improper conduct.

Bribery and corruption – whether involving government officials, or commercial entities, including joint ventures – can be direct or indirect through third parties like agents, brokers and joint venture partners. It includes facilitation payments even though in some countries facilitation payments are legal.

### Scope

Under the UK Bribery Act 2010, Joe Roocroft & Sons Ltd is required to put procedures in place to prevent bribery by any individual or organisation that performs services for or on behalf of Joe Roocroft & Sons Ltd. Consequently, this policy applies to every employee, contractor, director and officer in Joe Roocroft & Sons Ltd.

Contractors, consultants or suppliers who are our agents or who are working on our behalf or in our name, through outsourcing of services, processes or any business activity, will be required to act consistently with this policy when acting on our behalf. Independent contractors, consultants or suppliers will be made aware of this policy as it applies to our people in their dealings with them. Our responsible procurement and supplier management policy will also continue to apply to suppliers.

### Policy

Joe Roocroft & Sons Ltd does not tolerate any form of bribery or corruption.

You must not offer, pay, make, seek or accept a personal payment, gift or favour in return for favourable treatment or to gain any business advantage. You must follow the anti-bribery and corruption laws to which you and Joe Roocroft & Sons Ltd are subject, remembering that UK anti-bribery and corruption laws apply wherever you are operating.

You are liable to disciplinary action, dismissal, legal proceedings and possibly imprisonment if you are involved in bribery and corruption.

You must ensure people who work for and with you understand bribery and corruption is unacceptable.

You must comply with Joe Roocroft & Sons Ltd procedures for the prevention of bribery and corruption.

### Adequate procedures

Anti-bribery and corruption is a business priority. Joe Roocroft&Sons Ltd shall regularly and systematically identify bribery and corruption risks in its business and implement adequate risk-based procedures aimed at preventing bribery and corruption occurring including:

- **Communication** – We will communicate this policy and relevant guidance to employees across the company, through our internal communication channels. We will also communicate this policy to our suppliers, contractors and customers.
- **Training** – We will ensure that those within the scope of the policy receive training appropriate to their activities and the associated risks.
- **Books and records** – We will maintain adequate books and records which properly and fairly document all financial transactions. We will maintain written evidence to record compliance with this policy.
- **Audit** – Our internal control systems will be subject to regular internal and independent audit to provide assurance that they are effective in countering bribery and corruption.
- **Business relationships** – We will ensure that our business partners –including contractors, suppliers, agents, brokers and joint venture partners –are fit to do business with.
- **Supply chain** – We will address bribery and corruption risk in our supply chain including by ensuring that payments made for goods and services are reasonable.
- **Conflicts of interest – Gifts and hospitality** – We will address conflicts of interest and the risks created by gifts and hospitality through the implementation of our internal policies.
- **Government officials** – We will implement procedures applicable to our (or our agents', or those suppliers in our supply chains') dealings with government officials, political parties and related persons or organisations.

### Responsibilities

The Commercial Director is the Board director with primary accountability for our anti-bribery and corruption efforts and shall report the results of adherence to this policy at least annually to the Joe Roocroft&Sons Ltd Board of Directors.

Directors are accountable for implementing this policy within their business units.

### Reporting actual or potential violations and seeking guidance

You must report actual, potential or suspected corruption in Joe Roocroft&Sons Ltd or by any individual or organisation with whom Joe Roocroft&Sons Ltd does business. Failure to do so may result in liability for Joe Roocroft&Sons Ltd and for you personally.

You must report any request for an improper payment, or any indication that a person might be making corrupt payments or that a person has an intention or plan to violate this policy.

You have a similar obligation to report any information or knowledge of any hidden fund or asset, of any false or artificial entry in Joe Roocroft&Sons Ltd books and records, or any payment that circumvents Joe Roocroft&Sons Ltd internal financial processes.

**Reports must be made immediately.** Your report may be made if any instance of bribery or corruption is identified, an investigation will take place under the guidance of the Commercial Director.

Joe Roocroft&Sons Ltd will review this policy annually and whenever circumstances arise that show the policy needs amending.



**David Roocroft**  
**Commercial Director**

01 May 2018 Reviewed