

POLICIES

ANTI-BRIBERY AND CORRUPTION POLICY

The company is committed to applying the highest standards of ethical conduct and integrity in its business activities in the UK and overseas. Every employee and individual acting on the Company's behalf is responsible for maintaining the Company's reputation and for conducting Company business honestly and professionally.

The Company considers that bribery and corruption have detrimental impact on business by undermining good governance and distorting free markets.

The Company benefits from carrying out business in a transparent and ethical way and helping to ensure that there is honest, open and fair competition in the industry sector. Where there is a level playing field, the Company can lead the market through delivering excellent services and products to its customers.

Transparent, fair conduct helps to foster deeper relationships of trust between the Company and its business partners and customers. It is vital for the Company's reputation and future growth.

The Company does not tolerate any form of bribery, whether direct or indirect, by, or of, its employees, officers, agents or consultants or any persons acting on its behalf. The board and senior management are committed to implementing and enforcing effective systems throughout the Company to prevent, monitor and eliminate bribery in accordance with the Bribery Act 2010.

All employees and other individuals acting for the Company are required to familiarise themselves and comply with the Company's anti-bribery procedure as detailed under this section with immediate effect.

A bribe is a financial advantage or other reward that is offered to or received by an individual or Company (whether directly or indirectly) to induce or influence that individual or Company to perform public or corporate functions or duties improperly.

UNACCEPTABLE BEHAVIOUR

The following is unacceptable behaviour and must not occur:

- Accepting any financial or other reward from any person in return for providing some favour.
- Requesting a financial or other reward from any person in return for providing some favour.
- Offering a financial or other reward to any person in return for providing some favour.

BUSINESS GIFTS

From time to time, customers, suppliers or other persons might offer a gift to an employee. This could be a small item or something of considerable value. All gifts, however small, must be reported to the Line Manager and recorded, these gifts and benefits are the property of the Company and the Company will determine the most appropriate method of appointing them amongst the employees. No gifts with a value of more than £25.00 may be accepted. If a gift is offered and then refused because of its value, this must then be reported to the Director. If any of these rules are not adhered to then such activity may be deemed a disciplinary matter and may result in dismissal.

HOSPITALITY

From time to time, customers, suppliers or other persons might invite an employee to a hospitality event. All such invitations must be reported to your Line Manager. Permission must be given by your Line Manager before an employee accepts an invitation.

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OFFERING GIFTS AND HOSPITALITY

It is the Company's custom to offer small gifts such as pens, diaries, to customers, suppliers and other persons. If a gift is authorised, the employee is entitled to give it to the appropriate individuals. A record must be kept of all gifts. The Company occasionally runs hospitality events, primarily aimed at thanking customers and suppliers for their custom and loyalty. An employee must not organise any additional hospitality event without seeking authority from his or her Line Manager.

MANAGER RESPONSIBILITIES

Company Managers are responsible for keeping record of all gifts and hospitality that are offered and/ or received by employees working in the Managers area of responsibility. If a Manager is concerned about any actions, they should contact the Managing Director immediately for advice. Managers are also responsible for ensuring that all employees are aware of this policy and fully understand the rules in relation to the acceptance of gifts and hospitality.

EXPENSES

Line Managers must authorise all expense claims from their employees. In accordance with delegation of authority, Line Managers are expected to check and sign all expense claims from their employees against receipts.

Any items of expenditure that give rise to concern should be fully investigated.

ATTEMPTS TO BRIBE

Any employee who is concerned that he or she is potentially being bribed should report this matter to his or her Line Manager immediately.

DONATIONS TO COMPANIES

No employee should make donations to charity on behalf of the Company without approval off their Line Manager. No donations should be made to charities, political parties or other companies with the intention of gaining a business advantage.

DISCIPLINARY ACTION

A breach of the Company's anti-bribery policy by an employee will be treated as grounds for disciplinary action, which may result in a finding of gross misconduct and immediate dismissal. Employees and other individuals acting for the Company should note that bribery is a criminal offence that may result in up to 10 years imprisonment and or an unlimited fine for the individual and an unlimited fine for the Company.

RAISING CONCERNS

If an employee is concerned that acts of bribery are occurring in the Company, they should inform their Line Manager in the first instance. If this course of action is inappropriate, the employee should inform the Managing Director.

Training on this policy is provided to all employees and workers and our zero- tolerance approach to bribery and corruption will, where appropriate be communicated to clients, suppliers, contractors and business partners.

Midland Lead monitors the effectiveness and reviews the implementation of this policy at appropriate intervals, considering its suitability, adequacy and effectiveness. Any improvements identified are made as soon as possible. Internal control systems and procedures are also subject to regular review to provide assurance that they are effective in countering any risks to bribery and corruption.

All employees and workers are aware that they are responsible for the success of this policy and should ensure that they use it to disclose any wrongdoing.

SIGNED:
Managing Director



DATE: December 2019

REVIEW DATE: December 2020