



Anti Corruption and Bribery Policy

Aim of the policy:

Express Fire Equipment Ltd is committed to conducting its business activities in a consistent manner with the highest standards of integrity, business ethics and conduct. We have a commitment to be honest, fair and forthright in all of our business activities with both customers and suppliers.

All suppliers, sub contractors and partners of Express Fire Equipment Ltd are expected to conduct themselves in an honest, fair and forthright manner and adhere to our Anti Corruption and Bribery Policy.

Bribery is a criminal offence and Express Fire Equipment has a zero tolerance for bribery. We will not accept nor offer bribes. We will not accept nor offer improper inducements to anyone for any purpose.

Bribery is defined as giving or receiving some advantage (financial or otherwise) to encourage a person for performing their functions or activities improperly or to reward that person for having already done so. For example, a financial reward could be presented to a decision maker rather than the normal means of a tender process.

The Company Directors and Managers are committed to prevent corruption and bribery by persons associated with it. The company fosters a culture in which corruption and bribery are never acceptable.

This policy will be available to all members of staff and a copy is available upon request or to download via our website at www.expressfire.com.

Objective of the policy:

This policy sets out Express Fire Equipment Ltd's framework to ensure that all Express Fire Equipment Ltd's staff, customers, suppliers and any other internal or external partners of Express Fire Equipment Ltd understand the company's Anti Corruption and Bribery Policy. The Policy is in full compliance with the Anti Corruption and Bribery Act 2010.

We require that all staff, suppliers, sub contractors and partners:

- Act honestly and with integrity at all times working to safeguard our resources for which they are responsible
- Comply with the spirit as well as the letter, of the laws and regulations of all jurisdictions in which the company operates, in respect of the lawful and responsible conduct of activities.

Scope of the policy:

This policy applies to all of our business activities. We expect all of our business partners, customers and suppliers to operate similar policies and to respect and work to our company's Anti Corruption and Bribery Policy.

The responsibility for the implementation of the policy and to control the risk of bribery resides within all staff levels of the company and operating across all business areas. The policy applies to all permanent and temporary staff, contractors, agency staff, consultants and companies who Express Fire Equipment Ltd engages to act on their behalf or to provide professional services (including, but not limited to financial and legal).



Express Fire Equipment Ltd commits to:

Set out a clear Anti Corruption and Bribery Policy.

- Keep the policy up-to-date and communicate it to all of our staff and interested parties
- Disseminate the policy to staff and to make staff aware of their responsibility to adhere strictly to this policy at all times.
- To provide staff with access to further information and/or support in relation to Anti Corruption and Bribery
- Encourage our staff to be vigilant and to immediately report any suspicions of Anti Corruption or Bribery to a Company Director
- Rigorously investigate allegations of alleged corruption and bribery and cooperate with the Police and other appropriate authorities
- Take firm action in line with our company Disciplinary and Dismissal procedure against any individual(s) involved in corruption and bribery

Proportionality:

Express Fire Equipment Ltd operates predominantly in the UK and established countries where corruption and bribery are not commonplace. It is therefore considered that the risk of corruption and bribery is low.

Top Level Commitment:

The Directors and Managers of Express Fire Equipment Ltd are committed to ensuring that all staff, customers, suppliers and partners of Express Fire Equipment Ltd are aware that corruption and bribery are not tolerated in any way by Express Fire Equipment Ltd. This commitment will be communicated through our Anti Corruption and Bribery Policy. The Policy will be communicated to all staff and will be available on our website (www.expressfire.com) or upon request.

Risk Assessment:

Express Fire Equipment Ltd faces little risk of bribery: we operate primarily within the UK and established European countries and we trade predominantly in goods rather than services. We already undertake checks and searches on all customers before working with them and we operate using an approved suppliers list: our checks include credit searches. Copies of new customer registration documents and our supplier agreements are available upon request.

Due diligence:

Express Fire Equipment Ltd predominantly works with suppliers who supply goods only (rather than services) and undertaking due diligence is not considered necessary in most cases. As part of our supplier sub contract agreement we undertake basic company checks which appear to be sufficient in line with the Bribery Act 2010.

Communication:

This policy will be available on our website (www.expressfire.com) as well as being made available upon request. A copy is provided to all staff.

Monitoring and review:

Express Fire Equipment Ltd will actively monitor its policy and any changes in Anti Corruption and Bribery on an ongoing basis and changes will be made where necessary.

Anti Corruption and Bribery Act:

The Anti Corruption and Bribery Act came into effect on the 1st July 2011. The Act is not concerned with fraud, theft, books and record offences, Companies Act offences, money laundering offences or competition law.

Companies are liable if a senior person with the company commits an offence in relation to the Act.



There are four key offences under the Act:

- Bribery of Another Person Section 1
- Accepting a bribe Section 2
- Bribing a foreign official Section 6
- Failing to prevent bribery Section 7

Sections 1 and 2 of the Bribery Act 2010 makes it an offence to offer, promise or give a bribe as well as making it an offence to request, to receive or accept a bribe.

Section 6 makes it an offence to bribe a foreign public official with the intention of obtaining or retaining business or an advantage in the conduct of business.

Section 7 makes it an offence of failure of a commercial organisation to prevent bribery that it is intended to obtain or retain business or an advantage in the conduct of business for the organisation. This is known as a 'strict liability;' offence meaning that there is no need to prove negligence or management complicity. An organisation will only have defence to this corporate offence if they can demonstrate that it had in place adequate procedures designed to prevent bribery.

Severe penalties can be imposed on individuals and companies if convicted under the Bribery Act 2010 including fines and/or imprisonment.

Express Fire Equipment Ltd's Anti Bribery Policy:

Express Fire Equipment Ltd states that it is unacceptable to:

- Give, promise to give, or offer payment, gift or hospitality with the expectation or hope that a business advantage will be received or to reward a business advantage already give
- Give, promise to give, or offer a payment, gift or hospitality to a Government official, agent or representative to facilitate or expedite a routine procedure
- Accept payment from a third party that you know or suspect of offered with the expectation that it will obtain a business advantage for them
- Accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advance will be provided by Express Fire Equipment Ltd in return
- Retaliate against or threaten a person who has refused to commit a bribery offence or who has raised concerns under this policy
- Engage in any activity in breach of this policy

Facilitation payments:

Facilitation payments are not tolerated and are illegal. Facilitation payments are unofficial payments made to a public official in order to secure or expedite actions.

Financial controls:

Express Fire equipment Ltd engages the services of a professional Accountant in the preparation of annual and ongoing accounts. Our financial records are subjected to auditing and checks by our finance providers and any anomalies that are highlighted (including but not limited to, making or receiving of bribery acts) will be investigated in accordance and adherence with this policy.

Hospitality:

Hospitality and similar business expenditure that is reasonable and proportionate is not prohibited under the Act and Express Fire Equipment will continue to offer limited acts of hospitality to customers and will also continue to accept act of hospitality from suppliers when



carrying out the work of the business. Examples of hospitality and similar business expenses include providing tickets (e.g. to sporting events), taking clients to dinner, offerings of gifts to client as a reflection of good relations, or paying for reasonable travel expenses. Records of hospitality gifts and details of the recipient will be maintained. All acts of hospitality (both made and received) must be authorised by a Company Director and it is determined that no single act of hospitality (per act/person) will exceed £250.00 plus VAT (if applicable) per single transaction.

Charitable donations:

From time to time, Express Fire Equipment Ltd does make charitable donations. Donations may only be authorised by the collective agreement of the Board of Directors and no single charitable donation will exceed £250.00 plus VAT (if applicable) per recipient per year without full board approval and justification. We do not make political donations of any kind. All charitable donations will be recorded as part of our accounts.

Staff responsibilities:

- All staff are required to act in accordance with this policy at all times and any breaches of this policy will be dealt with in line with company's Disciplinary and Dismissal Procedure
- Staff should ensure that they have read, understood and comply with this policy
- Staff should raise concerns as soon as possible if they suspect that a conflict with this policy has arisen or may occur in the future

Raising a concern:

Express Fire Equipment Ltd is committed to ensuring that all staff have a safe, reliable and confidential way of reporting any suspicious activity. We want each and every member of staff to be aware of the procedures by which they can raise a concern.

If staff are aware of any instance of corruption and bribery they should report it to any of the Company Directors immediately. If staff do not wish to communicate their concern via a Company Director then it can be reported in the first instance to your Manager or the Company Solicitors.

All concerns will be fully investigated in accordance with the principles of this Policy and the Anti Corruption and Bribery Act 2010.

This policy was adopted by the Board of Directors in July 2011.