

Anti Bribery & Corruption Policy

The company is aware of its responsibility to abide by the requirements of the Bribery Act 2010 and has established the following:

Purpose

The purpose of this policy is to set out the responsibilities of Group functions in observing and upholding our policy on bribery and corruption.

Scope

This policy applies to all persons engaged in work activities on behalf of the company and applies to all activities provided by the business.

Policy Statement

Elliott Environmental Services Ltd does not engage in bribery or any unethical inducement or payment including facilitation and 'kickbacks'. All employees are required to avoid any activities that might lead to, or suggest, a conflict of interest with the business of the company. Employees are required to disclose details of hospitality or gifts offered or accepted. Company managers will review such disclosures. The company does not make direct or indirect contributions to political parties. The company will abide by all laws relating to countering bribery and corruption in all aspects of business.

Responsibilities

The Managing Director is the main stakeholder with primary responsibility for implementing this policy. Departmental Managers have responsibility for establishing the policy within their area of operations. All employees are to receive training and guidance on the application of this policy and are required to follow the established procedures.

Concerns, Reporting and Support

All persons are encouraged to raise concerns relating to suspicions or incidents of malpractice at the earliest opportunity. In the first instance the matter can be raised with a first line manager or if deemed appropriate directly to the Managing Director. Employees will receive full support when refusing to pay a bribe even if the result means that the company may lose business opportunities. Equally all employees are required to refuse bribes intending to provide advantages to a supplier.

Monitoring and Review

The Company Management will periodically review the effectiveness of the policy and make improvements where and when appropriate.

Records

Suitable records will be maintained to ensure that feedback on performance is available for review and ongoing development of the policy

Signed



Lloyd Crisp
Managing Director
Elliott Environmental Services Ltd
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