



H A Marks Ltd ANTI-BRIBERY POLICY

Bribery is, unfortunately, a feature of corporate and public life. Our corporate conduct and that of our employees (staff, contractors, and temporary employees) is based on our commitment to acting professionally, fairly and with integrity at all times. HA Marks does not and will not tolerate any form of bribery within its business. HA Marks is committed to operating responsibly wherever we work and to engage the social, environmental, and ethical impact of our activities in the markets in which we operate. Our first principle in operating responsibly is with regard to 'integrity in corporate conduct', in that HA Marks does not engage in bribery or any form of unethical inducement or payment including facilitation payments and 'kickbacks'. All employees (staff, contractors, and temporary employees) are required to avoid any activities that might lead to, or suggest, a conflict of interest with the business of HA Marks. All employees (staff, contractors, and temporary employees) must not accept under any circumstances any hospitality or gifts without first gaining the consent of the Managing Director. We will uphold laws relevant to countering bribery in all circumstances and in particular will comply with the Bribery Act 2010.

Responsibilities

The Managing Director will ensure that any instance of bribery is identified within HA Marks and dealt with by taking appropriate remedial action immediately.

Training and communications

We will communicate this policy to HA Marks employees (staff, contractors, and temporary employees) through our established internal communication channels and briefing processes.

Raising concerns and seeking guidance

HA Marks employees (staff, contractors, and temporary employees) are encouraged to raise concerns about any instance of malpractice at the earliest possible stage in total confidence to their immediate manager/supervisor.

Monitoring and review

HA Marks will review the implementation of this policy in respect of its suitability, adequacy and effectiveness on an annual basis and make improvements as appropriate.

Date: Jan 2024

Next Review Date: Jan 2025

Managing Director

Adrian Crowe MCIOB

A handwritten signature in black ink, appearing to read "Adrian Crowe", written over a horizontal line.

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