

BRIBERY & CORRUPTION POLICY

Introduction

Bribery is defined as giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for having already done so, i.e. to seek to, or to actually influence a decision-maker by giving some kind of extra benefit to that decision maker rather than by what can legitimately be offered as part of a tendering process.

Awareness

We at Shawston International Ltd are aware of our responsibilities under the provisions of the Act and have designated our Senior Leadership Team as the nominated persons to implement and review our policy and to ensure that all persons operating under and with the authority of our Managing Director are fully aware of the provisions of the Bribery Act.

Shawston International maintains a comprehensive list of all political and charitable contributions, gifts, hospitality and expenses made and received by its employees, staff, officers and directors.

Taking Action

Shawston International strictly forbids any person or business operating under the authority of Shawston from engaging in any form of bribery or corrupt conduct as defined by the Act. Failure to adhere to this instruction will invoke the Shawston disciplinary procedure in addition to possible legal action.

Shawston requires any director, officer or employee to report to the nominated person any approach made to them, either directly by a third party, to participate in any act that could be deemed as a breach of the Bribery Act. The reporting of such an occurrence will be covered by the Shawston whistle-blowing procedures. Failure to adhere to this instruction will invoke the Shawston disciplinary procedure.

Our Customers & Supply Chain

Shawston will take all reasonable steps to ensure that any company, agent, sub-contractor, supplier or any business that Shawston engages with are fully aware of their responsibilities under the Act and can produce, on request, documentary evidence of their own anti-corruption policy.

In addition, Shawston shall also comply with any action required by any professional bodies of which it is a member to verify its anti-corruption policy.

Authorisation



November 2023

Tom Rigby

Group Managing Director

On behalf of the Shawston Executive Report

Shawston Head Office

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