



ANTI-BRIBERY AND CORRUPTION POLICY

Version 1.1

04 December 2025

1. Purpose

The purpose of this policy is to ensure that Hickey Plant Hire conducts its business in an ethical, transparent, and lawful manner. The policy establishes procedures to ensure compliance with all applicable anti-bribery and corruption legislation, including the **UK Bribery Act 2010**, and to promote responsible and professional conduct across all areas of the business.

This policy supports our commitment to integrity, fairness, and accountability in all of our business relationships.

2. Policy Statement

Bribery is defined as the offering, promising, giving, accepting, or requesting of an advantage as an inducement for an action which is illegal, unethical, or a breach of trust. A bribe may include money, gifts, hospitality, services, or any other form of benefit intended to secure an improper advantage.

Hickey Plant Hire operates a **zero-tolerance approach to bribery and corruption**. We are committed to conducting all business dealings honestly, fairly, and with integrity. We will not engage in any form of bribery, whether directly or through third parties.

We will comply with all laws and regulations relating to anti-bribery and corruption in all jurisdictions where we operate. In particular, we are bound by the **UK Bribery Act 2010**, which applies both within the UK and internationally.

Individuals found to have engaged in bribery or corruption may face serious consequences, including criminal prosecution, imprisonment, and financial penalties. The company may also face significant fines, exclusion from public contracts, and reputational damage. For this reason, we take our legal and ethical responsibilities extremely seriously.

3. Scope

3.1 Who This Policy Applies To

This policy applies to all individuals working for or on behalf of Hickey Plant Hire, including:

- Directors and managers
- Permanent, temporary, and agency employees
- Contractors and consultants
- Apprentices and trainees
- Any other person representing or acting on behalf of the company

The policy also applies to all interactions with **third parties**, including:

- Customers and clients
- Suppliers and subcontractors
- Business partners and agents
- Consultants and advisers
- Government officials and public authorities
- Political representatives or organisations

This policy covers:

- Bribes
- Gifts and hospitality

- Facilitation payments
- Political contributions
- Charitable donations

3.2 Bribery

Employees must not offer, promise, give, request, or accept any form of bribe, either directly or through a third party. This includes any attempt to influence a business decision, secure an unfair advantage, or improperly influence a public official.

Under no circumstances should any employee attempt to bribe a public official or government representative.

3.3 Gifts and Hospitality

Reasonable and proportionate business hospitality may be acceptable when it is transparent, lawful, and intended to build legitimate business relationships.

However, employees must not offer or accept gifts or hospitality that:

- Could be considered improper or illegal
- Could influence or appear to influence business decisions
- Violate the policies of the receiving organisation
- Are offered to public officials or government representatives
- Are excessive in value or frequency

As a general guideline:

- Individual gifts should not exceed **£20**
- Hospitality should not exceed **£50 per event**
- The total value should not exceed **£200 per financial year**

Any gift or hospitality exceeding these limits must receive **prior written approval from a Company Director**.

Cash gifts or equivalents must **never** be accepted.

If refusing a gift is not practical or culturally appropriate, the gift should be declared to management and may be donated to charity.

3.4 Facilitation Payments and Kickbacks

Facilitation payments are unofficial payments made to secure or expedite routine government actions.

Hickey Plant Hire strictly prohibits facilitation payments. Employees must not make such payments under any circumstances.

If a payment is demanded and there are concerns about personal safety, the situation should be reported to management as soon as possible.

3.5 Political Contributions

Hickey Plant Hire does not make political donations or contributions to political parties, organisations, or candidates.

Such contributions may be perceived as attempts to gain improper business advantage and are therefore prohibited.

3.6 Charitable Contributions

The company supports legitimate charitable and community initiatives. However, charitable donations must never be used to disguise or facilitate bribery.

All charitable contributions must:

- Be lawful and transparent
- Be approved in advance by a Company Director
- Be properly recorded in company accounts

4. Employee Responsibilities

All employees must:

- Read, understand, and comply with this policy
- Conduct business ethically and with integrity
- Avoid any activity that could result in or appear to result in bribery or corruption
- Report any suspected breaches of this policy immediately

Failure to comply with this policy may result in disciplinary action, including dismissal for gross misconduct.

The company reserves the right to terminate relationships with contractors or suppliers who breach this policy.

5. Record Keeping

Accurate financial records must be maintained for all transactions involving third parties.

Employees must:

- Record all gifts and hospitality offered or received
- Ensure expenses claims accurately reflect the purpose of expenditure
- Maintain clear documentation for all payments

No off-book accounts or hidden financial arrangements are permitted.

6. Raising Concerns

Employees are encouraged to raise concerns about suspected bribery or corruption as early as possible.

Concerns should be reported to:

- A line manager, or
- A Company Director

All reports will be treated seriously and handled confidentially where possible.

7. Protection for Reporting Concerns

Hickey Plant Hire encourages an open and honest culture. Employees who report concerns in good faith will be supported and protected.

No individual will suffer disciplinary action, dismissal, or any form of retaliation for refusing to participate in bribery or for reporting concerns.

8. Training and Communication

All employees will receive appropriate information and training regarding this policy.

Our zero-tolerance approach to bribery and corruption will be communicated to suppliers, subcontractors, and business partners where appropriate.

9. Responsibility for the Policy

The **Company Directors** are responsible for ensuring this policy complies with legal obligations and is implemented effectively throughout the organisation.

Management at all levels are responsible for ensuring employees understand and comply with this policy.

10. Monitoring and Review

This policy will be reviewed periodically to ensure it remains effective, appropriate, and compliant with relevant legislation.

Internal procedures and controls may be audited to ensure compliance.

Employees are encouraged to provide feedback or suggestions to improve the policy.