

 shstructures limited	QHSE Management System	Bribery and Corruption Policy		
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It is the policy of **SH Structures Limited** to conduct all of our business in an honest and ethical manner. We have a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships in all our business activities.

The **SH Structures Limited** Board of Directors will ensure the company's position of bribery and corruption is communicated to all its employees and put in place the necessary systems to counter bribery and corruption.

SH Structures Limited will uphold all legislation relating to bribery and corruption within in the UK and Overseas where applicable. SH Structures will carry out all its activities in compliance with The Bribery Act 2010.

The detailed requirements of our Bribery and Corruption Policy will be documented within the company Employees Manual. The manual will set out our responsibilities, and those of third parties who carry out work for the company.

The Employees Manual will set out individual responsibilities and guidance on the specific procedures in place to report any incidents of Bribery or Corruption and the Company Whistle Blowing Policy.

This policy applies to all individuals working for **SH Structures Limited** and any other Third Party associated with the company.

The Act defines bribery as giving or receiving financial or other advantage in connection with the "improper performance" of a position of trust, or a function that is expected to be performed impartially or in good faith.

Bribery does not have to involve cash or an actual payment exchanging hands and can take many forms such as a gift, lavish treatment during a business trip or tickets to an event.

Hospitality is not prohibited by the Bribery Act however all hospitality must be approved by the company Managing Director.

The types of bribery that the company may be exposed to may include:-

- Bribery in order to secure or keep an order or contract.
- Bribery to gain any advantage over a competitor.
- Bribery of a local, national or foreign official to secure a contract.
- Bribery to turn a blind eye to a health safety issue or poor performance or substitution of materials.
- Bribery to falsify an inspection report or obtain a certificate.

Our Bribery and Corruption Policy will be communicated to our suppliers and those who do business with **SH Structures Limited**. Where appropriate these third parties will be asked to provide evidence of their own Bribery and Corruption Policy.

Training will be provided where required by appropriately qualified and accredited organisations and individuals to ensure staff will comply with all relevant industry legislation and guidelines.

The details and scope of this policy will be reviewed annually and updated/amended to reflect any changes in the company activities or in the current applicable legislation.

S J Holden
Managing Director
SH Structures Limited

14th January 2020