

Stainless UK Limited
Newhall Road Works · Sheffield · S9 2QL

Anti-Bribery and Corruption Policy

Stainless UK Ltd values its reputation and is committed to maintaining the highest level of ethical standards in the conduct of its business affairs. The actions and conduct of the firm's staff as well as others acting on the company's behalf is key to maintaining these standards.

The purpose of this document is to set out the company's policy in relation to bribery and corruption. The policy applies strictly to all employees, directors, agents, consultants, contractors and to any other people or bodies associated with the Stainless UK Ltd, within all regions, areas and functions,

Acts of bribery or corruption are designed to influence an individual in the performance of their duty and incline them to act in a way that a reasonable person would consider to be dishonest in the circumstances.

Bribery can be defined as offering, promising or giving a financial (or other) advantage to another person with the intention of inducing or rewarding that person to act or for having acted in a way which a reasonable person would consider improper in the circumstances. Corruption is any form of abuse often trusted power for private gain and may include, but is not limited to, bribery.

Bribes are not always a matter of handing over cash. Gifts, hospitality and entertainment can be bribes if they are intended to influence a decision.

Under the Bribery Act 2010, bribery by individuals is punishable by up to ten years' imprisonment and/or an unlimited fine. If the company is found to have taken part in the bribery or is found to lack adequate procedures to prevent bribery, it too could also face an unlimited fine.

A conviction for a bribery or corruption related offence would have severe reputational and/or financial consequences for the company.

Stainless UK will not tolerate bribery or corruption in any form.

The firm prohibits the offering, giving, solicitation or the acceptance of any bribe or corrupt inducement, whether in cash or in any other form:

- to or from any person or company wherever located, whether a public official or public body, or a private person or company;
- by any individual employee, director, agent, consultant, contractor or other person or body acting on the firm's behalf;
- in order to gain any commercial, contractual, or regulatory advantage for the firm in any way which is unethical or to gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual,

This policy is not intended to prohibit the following practices provided they are appropriate, proportionate and are properly recorded:

- normal hospitality, provided that it complies with the firm's entertainment policy
- fast tracking a process which is available to all on the payment of a fee
- providing resources to assist a person or body to make a decision more efficiently, provided that it is for this purpose only.

It may not always be a simple matter to determine whether a possible course of action is appropriate, if you are in any doubt as to whether a possible act might be in breach of this policy or the law, the matter should be referred to the Managing Director. If necessary, external guidance can be sought.

The firm will investigate thoroughly any actual or suspected breach of this policy, or the spirit of this policy. Employees found to be in breach of this policy may be subject to disciplinary action which may ultimately result in their dismissal.

The prevention, detection and reporting of bribery or corruption is the responsibility of all employees throughout the company. If you become aware or suspect that an activity or conduct which is proposed or has taken place is a bribe or corrupt, then all employees have a duty to report this.

Signed



T Wells
Managing Director

Date: 4th January 2022