

Anti-Bribery Policy

The Chiltern Lift Company Ltd is committed to conducting all of our business in an honest and ethical manner. We take a zero tolerance approach to bribery and corruption, and we remain bound by the laws of the UK, particularly The Bribery Act 2010, in respect of our business dealings both at home and abroad. This policy establishes controls to ensure the highest ethical standards and compliance with applicable regulations.

Scope of Policy

This policy applies to all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term, or temporary), consultants, contractors, trainees, seconded staff, homeworkers, casual workers and agency staff, volunteers, interns, agents, sponsors or any other person associated with us, or any Group Company or their employees, wherever located.

It is a criminal offence to offer, promise, give, request or accept a bribe. Individuals found guilty can be punished by up to ten years' imprisonment and/or a fine. As an employer, if we fail to prevent bribery we can face an unlimited fine, exclusion from tendering for contracts and damage to our reputation. We therefore take our legal responsibilities very seriously. Any employee who breaches this policy will face disciplinary action, up to and including dismissal. We also reserve the right to terminate our contractual relationship with other workers if they breach this policy.

What is Prohibited

Bribery and Corruption

Bribery is offering, promising, giving or accepting any financial or other advantage, to persuade the recipient or any other person to act improperly, or to reward them for acting improperly. An advantage includes money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or anything else of value. Corruption is the abuse of entrusted power or position for private gain.

Facilitation Payments and Kickbacks

The Company prohibits facilitation payments or kickbacks to be made or accepted. Facilitation Payments are typically small, unofficial payments made to secure or expedite a routine or necessary action, for example by a government official. Kickbacks are typically payments made in return for a business favour or advantage. All employees must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.

If you have any suspicious concerns or queries regarding a payment, you should raise these with your line manager.

Gifts and Hospitality

This policy does not prohibit giving and receiving promotional gifts of low value and normal and appropriate hospitality that are given/received in good faith and not offered, promised or accepted to secure an improper advantage for The Company or any of its employees or associated persons. However, in certain circumstances gifts and hospitality may amount to bribery. The Company will not

The Chiltern Lift Company Limited, 8 Furlong Road, Bourne End. Buckinghamshire, SL8 5DG

T: 01628 529 247 F: 01628 810821 E: enquiries@chilternlifts.co.uk

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www.chilternlifts.co.uk



provide gifts or hospitality with the intention of persuading anyone to act improperly or to influence a public official in the performance of their duties.

If it is not appropriate to decline a gift of significant value, it may be accepted, provided it is then declared to the employee's manager, it may then be donated to charity.

The Company recognises that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift should always be considered.

Political and Charitable Contributions

The Company normally does not make donations to political parties or candidates, however in the unlikely event that such a payment is made, it would never be made in an attempt to influence any decision or gain a business advantage and are always publicly disclosed.

We believe that charitable donations can form part of our wider commitment and responsibility to the community. Where donations are made they will not be used as a scheme to conceal bribery and will be made legally and ethically under local laws and practices.

Anti-Facilitation of Tax Evasion

We expect the company and people we engage with to comply with their tax obligations. Tax evasion or its facilitation has no place and we do not tolerate any of our Directors, Officers or employees (together "Colleagues"), agents or business partners knowingly assisting or encouraging tax fraud by any of our customers, suppliers or others that we do business with.

We are committed to the following principles:

- We will carry out business fairly, honestly and openly.
- We will not provide services or sell to parties where we know or suspect that the services or the items sold will be misused or abused by a customer for the purposes of fraudulent tax evasion.
- We will not buy services or goods from any supplier where we know or reasonably suspect them not to be properly declaring their income and any relevant tax and duties in connection with those activities.
- Any colleague found to be in breach of these principles will face disciplinary action up to and including dismissal.
- No colleague will suffer demotion, penalty, or other adverse consequence for refusing to engage in the sale or purchase of services and goods where they reasonably suspect or know tax evasion to be taking place. Our clear policy is not to engage in transactions where tax evasion is present or suspected to be present, even if it may result in us losing business.
- We expect our agents and others who represent us also to commit to these principles.

Record Keeping

The Company will keep financial records and have appropriate controls in place. All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts should be prepared and maintained with strict accuracy and completeness.

You must declare and keep a written record of all hospitality or gifts accepted or offered, which will be subject to management review. All expenses claims relating to hospitality, or gifts, or expenses incurred to third parties must be submitted in accordance with our expense policy.

Raising a Concern

Employees and associated persons are encouraged to report any concerns that they may have to their line manager, or if this is not appropriate to an alternative senior manager, as soon as possible.

Any person who has reported an instance or concern of bribery in good faith will be supported by The Company. The Company will ensure that the individual is not subjected to detrimental treatment as a result of raising a bribery concern.

Monitoring and Training

The effectiveness of this policy will be regularly reviewed. Training sessions will be arranged for appropriate individuals where necessary. The Company reserves the right to amend and update this policy as required.



Signed by S. Festorazzi - Managing Director
The Chiltern Lift Company Ltd

Date: 2nd January 2025