

ANTI BRIBERY & CORRUPTION POLICY



Policy Statement

The Managing Director and all M&P personnel are responsible for maintaining the highest standards within our business operations. The Company take a zero-tolerance approach to bribery and corruption and are committed to conducting its business operations will integrity within all its relationships and business dealings.

Scope

This policy applies to:

1. All Company business operations for the purpose of the supply, hire, repair, service and calibration of surveying equipment to its customers.
2. All business operations pertaining to the procurement of services & products from its business partners/suppliers.
3. All business operations pertaining to the engagement of personnel for the purpose of carrying out Company business operations.
4. All personnel directly retained by the Company (acting on behalf of the Company).
5. Other (retained) personnel or agents acting on behalf or representing the Company.

Definitions

1. "Company" shall mean M&P
2. "Management Team" shall mean the Managing Director and such other senior personnel deemed applicable by the MD.
3. "Third Parties" shall denote any of the following: actual & potential customers, suppliers, business contacts, advisers and similar (this is not an exclusive/exhaustive list).

Applicable Legislation

The Bribery Act 2010 came into force on 01st July 2011. In summary:

1. It is illegal to offer, promise, give, request, agree, receive or accept bribes.
2. 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.
3. The Act does not cover fraud, theft, books & records offences, money laundering offences or other competition law.
4. The Company can be held liable when an employee or agent of the Company pays a bribe specifically to get business, keep business, or gain a business advantage for the Company.
5. Hospitality is not prohibited by the Act. Genuine hospitality or similar business expenditure that is reasonable, bona fide, & proportionate is acceptable. This includes promotional & other business expenditure.

Responsibilities

1. The Senior Management Team shall have overall
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3. responsibility for the implementation & compliance with the contents of this policy.
4. All M&P personnel must partake in the prevention, detection and reporting of bribery and/or other forms of corruption.

5. All M&P personnel are required to avoid any activity which might lead to a breach of this policy (and refer it to the Management Team).

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Reference:	011.1.2016.PL
Revision No:	9
Date of 1 st Issue:	29/02/2016
Current issue date:	22/11/2022

Commitments & Aims

The Company (via its Senior Management Team) is committed to:

1. Conduct its business operations in a fair and transparent manner.
2. Adhere to all applicable UK Employment Legislation (including but not limited to The Bribery Act 2010).
3. Adhere to all Government approved trading practices.
4. Work with its supply chain to ensure adherence to acceptable codes of practice.
5. Promote a collective commitment to good working practices.
6. Encourage the prevention of unlawful activity
7. Promote the detection of acts or omissions which might be considered to amount to bribery and/or corruption.
8. Encourage & guide/train M&P personnel to recognise and avoid the use of bribery by themselves and others.
9. Encourage M&P personnel to be vigilant and to report any suspicions of bribery and corruption by making it easy to report suspicions and by the sensitive handling of information.
10. Investigate allegations of alleged bribery and support the Police (and other appropriate authorities) in any investigations as may be required.
11. Take appropriate action against any individual(s) involved in bribery which may include disciplinary action.

All personnel retained, acting on behalf of, or representing the Company are required to make the following commitment:

1. Adhere to the remit of this policy and all bribery awareness training provided.
2. Adhere to the M&P code of conduct and all Hexagon group level ethic codes and policies.
3. Take personal responsibility for seeking guidance when unclear whether an act or omission may result in any allegation of bribery or the perception of bribery and inappropriate conduct.
4. Take personal responsibility for reporting any bribery risk factor concerns (these can be reported in accordance with Company Whistleblowing policy). If in doubt report it.

Bribery Risk Factors

Below are the key areas all personnel should be aware of:

Excessive gifts, entertainment & hospitality

Gifts, entertainment & hospitality are acceptable provided that they are not used to exert improper influence on decision makers. In particular, gifts, hospitality or entertainment should be avoided where they could influence the outcome of contractual negotiations. Always consider the appropriateness & reason for any gift or offer of hospitality.

Personnel must not open themselves up to suspicion of dishonesty or put themselves in a position of conflict between the interests of the Company and private interest.

It is acceptable for personnel to receive low value token gifts such as branded pens, stationery, mouse mats and similar if given by an existing supplier. Occasional boxes of confectionery would be acceptable when received and given to a department or the Company rather than an individual. Items deemed acceptable by this policy must be received openly and not in private. Items such as personal gifts, vouchers or money received from third parties would not be deemed acceptable.

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Personnel may receive invitations from third parties to corporate hospitality events. These may be accepted if:

1. Personnel from the third party are in attendance.
2. The third party does not pay accommodation and/or travel expenses.
3. The hospitality could not be construed as a reward or inducement.
4. The hospitality is not unduly lavish or extravagant.

Gifts, entertainment & hospitality (whether offered or to be received) should be approved by the Management Team in advance.

Facilitation payments

These are payments used by the Company or its personnel to secure or expedite the performance of a routine or necessary action to which the payer has an entitlement as of right. An example is a “back hander” or “grease payment”. These must not be offered or accepted.

When making a payment on behalf of the Company consideration should always be given to the value of the payment made for the goods or services provided. The payment should be proportional and a receipt for payment should be provided (& retained on record). Personnel must follow the correct purchasing procedure.

Questions, concerns and suspicions should be raised with the Management Team.

Reciprocal Agreements

Reciprocal Agreements are not acceptable unless they are legitimate business arrangements which are properly documented and approved by the Management Team. Any agreement to offer incentive to retain or secure business or any improper advantage would not be acceptable.

Miscellaneous Risk Factors (Red Flags)

This policy attempts to highlight scenarios that might typically be unacceptable but is not exhaustive. Each situation must be carefully considered on its merits. Consider the intention and appropriateness of the situation at all times.

Some examples of situations which should be referred to the Management Team might include:

1. A member of personnel becomes aware a third party engages in, or has been accused of, engaging in improper business practices.
2. A third party has a reputation for using or receiving inappropriate incentives.
3. A third party insists on receiving a commission or fee before they will sign a business contract.
4. A third party requests lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services.
5. A third party refuses to put the terms of an arrangement/agreement in writing.
6. A third party invoices the Company for a fee that appears large given the service stated to have been provided.
7. A third party requests personnel to overlook potential legal violations.

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Record Keeping

The Company will keep financial and other appropriate records in place to evidence the reason for all payments made to third parties. All records must be accurate and transparent.

Expense claims relating to hospitality, gifts or other expenses incurred must be accurately submitted with all supporting documentation in accordance Company procedure. Items not covered by expense claims must be properly documented following the Company's purchasing procedures.

All records (including but not limited to invoices, memoranda, contractual documents, term order arrangements, formal quotations & general correspondence) should be maintained with strict accuracy and completeness. It is not acceptable to have "off the book" communications to facilitate activities and/or payments which would be considered improper.

Any gift or hospitality which personnel plan to accept must be declared in advance to the Management Team and documented in writing. This information will be logged on a Gift and Hospitality Register found in the company drive (H/Sales Admin/ 022 Sales Admin RISQS Quality Management/998 Gift & Hospitality Register).

Implementation of Policy & Assessment of Risk

The Senior Management Team are responsible for implementation of this policy. This policy has been created to raise awareness of risk and provide a framework for identifying risks.

The policy will be reviewed, and subsequent revisions circulated to all personnel. Any communications pertaining to identified risks will also be circulated to all relevant personnel.

The Senior Management Team operate an "open door" policy with personnel and hold regular meetings to discuss workflow. During these meetings it is possible to assess any potential risks to the Company.

This in turn enables the Company to take steps to mitigate risks appropriately.

Reporting Suspected Bribery

The Senior Management Team is committed to creating an environment in which personnel feel able to raise genuine concerns in good faith without the fear of disciplinary action being taken against them (even if their concerns turn out to be mistaken).

Personnel with knowledge of bribery in any form should not remain silent.

Personnel shall not suffer detrimental treatment as a result of refusing to take part in activity which they believe may be construed as actual or potential bribery or other offence. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a legitimate concern.

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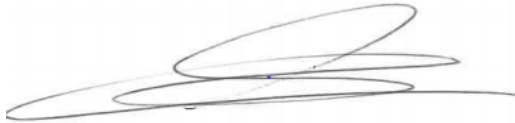
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All concerns must be escalated to the straight to the Management Team in writing, for investigation. The report can be made in accordance with the process set out in the Company Whistleblowing Policy.

Compliance & Review

1. The Senior Management Team will be responsible for managing the compliance of all personnel with the remit of this policy.
2. The Senior Management Team are responsible for the suitable review of the remit of this policy and appropriateness of its content to Company business operations and practices (but may delegate any part of the review process as deemed appropriate).
3. All M&P personnel are responsible for working as trained and in accordance with this policy and issued working instructions.

Signed:



Print name: Kevin Smith

Position: Managing Director

Revision 9

Date: 22nd November 2022

Next review: 22nd November 2023