



## **Northbridge Industrial Services plc and group companies**

### **Anti bribery and corruption policy**

A summary of our anti bribery and corruption policy is shown below.

#### **Introduction**

Northbridge Industrial Services plc and its group companies ("Northbridge" or the "Company") are committed to ethical business, financial probity and reliability.

Northbridge has a zero tolerance policy in respect of improper or criminal behaviours. Northbridge will never authorise or condone the direct or indirect offering, payment gift or receipt of any improper financial or other advantage ("Bribery") in respect of company business.

All employees, officers and anyone performing services for or on our behalf must comply with this policy.

#### **Scope: who does the policy apply to?**

This Policy applies to all levels and grades of staff including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, sub contractors, trainees, seconded staff, home-workers, part-time and fixed term workers, casual workers and agency staff, (collectively referred to as workers in this policy) as well as organisations or other third parties who act for or on behalf of /with which Northbridge conducts business.

#### **Policy statement**

Northbridge prohibits the direct or indirect offering, giving, solicitation or acceptance of any bribe, whether cash or other inducement or advantage; to or from any person or company, wherever they are situated; whether such person is a public official or body, private person or company, any individual working at Northbridge who meets with the requirements of the above paragraph or any organisation or third party acting on Northbridge's behalf in order to gain any commercial, contractual, regulatory or other advantage for Northbridge in a way which is unethical or in order to gain any personal advantage, pecuniary or otherwise, for any individual working at Northbridge or anyone connected with that individual.

This policy also prohibits bribery by way of any financial or other advantage given as a reward for improper behaviour or breach of duties.

#### **What is a bribe?**

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory, monetary, financial or other personal advantage.



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A kickback is a payment made in return for the award of a contract. Kickbacks are commonly funded by the recipient agreeing to an inflated contract price to take account of the improper payment to be made to the decision maker.

## **Gifts and hospitality**

Neither the law nor this policy prohibits normal and appropriate corporate hospitality. It can sometimes be difficult to decide what appropriate in respect of gifts and hospitality.

## **Facilitation payments**

Facilitation payments are small, unofficial payments made to secure or expedite a routine government action by a government official. Facilitation payments are not commonly paid in the UK, but may be common in some other jurisdictions. Northbridge does not authorise or make facilitation payments of any kind.

## **Donations**

Northbridge does not make contributions to political parties. Northbridge may make charitable donations but will not do so for the purpose of gaining any commercial advantage.

## **Record keeping**

In accordance with UK legal and regulatory practices, Northbridge is required to keep financial records and have appropriate internal controls in place to evidence that gifts or promotional expenditure is reasonable, proportionate, and made in good faith.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, will be prepared and maintained with strict accuracy and completeness. No accounts will be kept “off-book” to facilitate or conceal improper payments.

## **How to raise a concern**

Employees are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage.

## **Protection**

Individuals working at Northbridge who refuse to accept or offer a bribe, or those who raise concerns or report another’s wrongdoing, could be worried about possible repercussions. The Company encourages openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The Company is committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future.



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**Monitoring and review**

The effectiveness of this policy will be regularly reviewed by the Board of the Company. Internal control systems and procedures will be subject to audit under the internal audit process.