



LOUTH TRANSFORMER COMPANY LIMITED

ANTI BRIBERY & CORRUPTION POLICY

This policy applies to directors, officers and employees, including temporary employees of Louth Transformer Company Limited.

Bribery can be defined as the giving or receiving of something of value to influence a business transaction.

Corruption is an abuse of a position of trust in order to gain an undue advantage. Improper Performance is where the person receiving the bribe fails to act in good faith or impartially.

Purpose Statement

Louth Transformer Company is committed to corporate conduct which is based on acting professionally, fairly and with integrity. The company has zero tolerance to any form of Bribery or Corruption. It is a criminal offence for anyone to offer to accept a financial or any other kind of advantage with the intent to induce the improper performance of a business function.

Responsibilities

All colleagues are expected to act with integrity and obey all laws and regulations that apply to their work.

Improper influence may take many forms. Cash, gifts, meals, travel, entertainment, loans, charitable contributions, political contributions or offers of employment may all be used inappropriately in attempts to influence business decisions or government action.

Colleagues must ensure they do not give or receive anything of value which influences a business transaction, use any other means to improperly influence the decisions of clients, potential clients or government officials, or abuse a position of trust in order to gain an undue advantage.

Penalties

Under the Bribery Act 2010 individuals can receive up to 10 years imprisonment, an unlimited fine and director disqualification. Businesses may receive unlimited fines.