

ALLAN PEACOCK (STREET LIGHTING) LTD



ANTI-BRIBERY & CORRUPTION POLICY STATEMENT

ALLAN PEACOCK
STREET LIGHTING

Introduction

It is the policy of Allan Peacock (Street Lighting) Ltd (“the Company”) to ensure that all business is conducted ethically, professionally, legally, and in a fair, honest, and open manner.

The Company maintains a **zero-tolerance** approach to all forms of bribery and corruption, including but not limited to:

- The direct or indirect promise, offering, or authorisation of anything of value;
- The offer or receipt of any kickback, loan, fee, reward, or other advantage;
- The giving of aid, donations, or voting intended to exert improper influence;
- Payments for lavish or inappropriate entertainment or travel;
- Favours, including offers of employment;
- Facilitation payments;
- Inflated commissions;
- Fake consultancy agreements.

We oppose all forms of bribery and corruption, whether initiated by corrupt officials, companies, or individuals, and whether in the public or private sector, in the UK or abroad.

Policy Commitments

To uphold this policy, the Company will:

- **Provide Training:** Ensure all employees receive training on the Company’s Anti-Bribery and Corruption Policy to recognise risks and take preventative action.
- **Encourage Reporting:** Promote the use of formal *whistleblowing* channels or informal communication through an *open door* policy, enabling employees, subcontractors, and partners to report suspicions confidentially to senior management.
- **Understand Risks:** Maintain an understanding of how and where bribery risks might arise in our operations and implement appropriate controls to prevent them.
- **Enforce Disciplinary Measures:** Apply appropriate disciplinary action, including dismissal, and potential civil or criminal proceedings, in the event of any breach.
- **Monitor and Review:** Regularly monitor and review the Anti-Bribery and Corruption Policy to ensure its effectiveness.
- **Audit Expenses:** Monitor employee expense records to identify and investigate any irregularities that could indicate a breach of this policy.
- **Communicate Clearly:** Provide all employees with a copy of this Policy Statement and ensure ongoing awareness.

Consequences of Non-Compliance

Failure to comply with this policy may lead to disciplinary action up to and including dismissal. It may also result in civil or criminal charges.