

policy



Anti-Bribery Policy

John Nixon Ltd is committed to upholding responsible and fair business practices in relation to all of its business activities and operates a zero tolerance policy towards bribery and corruption.

This policy covers all workers including employees both permanent and fixed term, consultants, agency workers and volunteers (collectively referred to as workers in the policy).

It is not acceptable to give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given, or to accept a payment, gift or hospitality from a third party that you know or suspect is offered or provided with the expectation that it will obtain a business advantage for them.

The giving of business gifts to clients, customers, contractors and suppliers is permitted provided the following requirements are met:-

- The gift is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage
- It is given in the Company's name, not in the giver's personal name
- It does not include cash or a cash equivalent (such as gift vouchers)
- It is of an appropriate and reasonable type and value and given at an appropriate time
- It is given openly, not secretly
- It is approved in advance by a Line Manager

Hospitality or entertainment may only be accepted if:-

- Employees or personnel from the supplier are in attendance
- The supplier does not pay any accommodation or (more than trivial) travel expense for Nixon Hire employees
- The entertainment and/or acceptance of it could not be interpreted as a reward, inducement or encouragement for a favour or preferential treatment; and
- It is not unduly lavish or extravagant

The Company's zero tolerance approach to bribery will be communicated to all new employees as part of the induction process. All existing employees will receive relevant updates on how to implement and adhere to this policy.

Employees are encouraged to raise concerns about any issue or suspicion of corruption at the earliest opportunity. Anyone who is unsure whether a particular act constitutes bribery or corruption should raise this via their line manager.

The Directors will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

A breach of any of the provisions of this Policy may constitute a disciplinary offence and will be dealt with in accordance with the Company's disciplinary procedure.

A handwritten signature in black ink, appearing to read 'J. Nixon'.

John Nixon

