



ANTI BRIBERY POLICY

Dated May 2024

Policy overview

One of our core values is to uphold sound, responsible and fair business operations. We are committed to promoting and maintaining the highest possible ethical standards in relation to all our business activities.

Our reputation for maintaining lawful business practices is of paramount importance to it and this policy is designed to preserve these values.

We therefore have a zero-tolerance policy towards bribery and corruption, and we are committed to acting fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery. We act in accordance to and comply with The Bribery Act 2010.

Purpose and scope of the policy

This policy sets out our position on any form of bribery and corruption and provides guidelines aimed at:

- ensuring compliance with anti-bribery laws, rules and regulations, not just within the UK, but also in any other country within which we may carry out its business or in relation to which its business may be connected
- enabling Employees and persons associated with us to understand risks associated with unlawful conduct and to enable and encourage them to be vigilant and to effectively recognise, prevent, avoid and report any wrongdoing, whether by themselves or others
- providing suitable and secure reporting and communication channels and ensuring that any information that is reported is properly and effectively dealt with
- creating and maintaining a rigorous and effective framework for dealing with any suspected instances of bribery or other unethical conduct

This policy applies to all permanent and temporary Employees of Darwen Electrical Services Ltd (including any of its intermediaries, subsidiaries, or associated companies).

It also applies to any individual or corporate entity associated with us or who performs functions in relation to, or for and on our behalf, including, but not limited to, directors, agency workers, casual workers, contractors, consultants, seconded Employees, agents, suppliers and sponsors (“associated persons”).

All Employees and associated persons are expected to adhere to the principles set out in this policy.

All Employees and associated persons are required to:

- comply with any anti-bribery and anti-corruption legislation that applies in any jurisdiction in any part of the world in which they might be expected to conduct business
- act honestly, responsibly and with integrity
- safeguard and uphold our core values by operating in an ethical, professional, and lawful manner always

Bribery of any kind is strictly prohibited. Under no circumstances should any provision be made, money set aside, or accounts created for the purposes of facilitating the payment or receipt of a bribe.

We recognise that industry practices may vary from country to country or from culture to culture. What is considered unacceptable in one place may be normal or usual practice in another. Nevertheless, a strict adherence to the guidelines set out in this policy is always expected of all Employees and associated persons.

We ensure our Employees understand if they have any doubt as to what might amount to bribery or other unethical conduct or might constitute a breach of this policy, they should refer the matter to our Anti-Corruption Officer.

Responsibilities and reporting procedures

It is the contractual duty and responsibility of all Employees and associated persons to take whatever reasonable steps are necessary to ensure compliance with this policy and to prevent, detect and report any suspected bribery or corruption in accordance with the procedure set out in our Public Interest Disclosure Policy.



Employees must disclose suspicions, or any other Employee or associated person, has plans to offer, promise, or give a bribe or to request, agree to receive or accept a bribe in connection with the business of Darwen Electrical Services Ltd. For the avoidance of doubt, this includes reporting someone's own wrongdoing. The duty to prevent, detect and report any incident of bribery and any potential risks rests not only with the Directors of Darwen Electrical Services Ltd but applies equally to all Employees and associated persons.

We encourage all Employees and associated persons to be vigilant and to report any inappropriate or unlawful conduct, suspicions or concerns promptly and without undue delay so that investigation may proceed and any action can be taken expeditiously. For example, if a client or potential client offers an Employee something to gain a business advantage with us or indicates to an Employee that a gift or payment is required to secure their business.

If an Employee wishes to report an instance or suspected instance of bribery, they should follow the steps set out in our Public Interest Disclosure Policy.

Confidentiality will be maintained during the investigation to the extent that this is practical and appropriate in the circumstances.

We are committed to taking appropriate action against bribery or other unethical conduct.

This could include either reporting the matter to an appropriate external government department, regulatory agency, or the police and/or taking internal disciplinary action against relevant Employees and/or terminating contracts with associated persons.

We will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are also committed to ensuring nobody suffers any detrimental treatment because 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 corruption offence has taken place or may take place in the future.

All Employees and associated persons must ensure that any contract or agreement entered into by them for or on our behalf contains an appropriate clause aimed at ensuring that any third party to the contract is aware of and agrees to adhere to the contents of this policy and further, that the contract expressly sets out the consequences of non-compliance including, where appropriate, clear provision for terminating the contract in the event of non-compliance or the commission of any relevant bribery offence.

Legal obligations

The key UK legislation on which this policy is based is the Bribery Act 2010 and it applies to our conduct both in the UK and abroad.

Record-keeping

All accounts, receipts, invoices and other documents and records relating to dealings with third parties must be prepared and maintained with strict accuracy and completeness.

No accounts must be kept "off the record" to facilitate or conceal improper payments.

Sanctions for breach

Breach of any of the provisions of this policy will constitute a disciplinary offence and will be dealt with in accordance with our disciplinary procedure.

Depending on the gravity of the offence, it may be treated as gross misconduct and could render the Employee liable to summary dismissal.

As far as associated persons are concerned, breach of this policy could lead to the suspension or termination of any relevant contract, sub-contract, or other agreement with the associated person.

Data protection

When processing information in connection with a report made in pursuance of this policy or when processing any records or documents relating to dealings with third parties which relates to personal data, we will process this in accordance with our data protection policy and any internal privacy notices in force at the relevant time. We act in accordance with the Data Protection Act 2018.

Data breaches and disclosures

Inappropriate access or disclosure of this data will constitute a data breach and should be reported immediately to the appropriate Line Manager in accordance with our data protection policy.



Reported data breaches will be investigated and may lead to sanctions under our disciplinary procedure.

Monitoring compliance

Our Anti-Corruption Officer has lead responsibility for ensuring compliance with this policy and will review its contents on a regular basis.

They will be responsible for monitoring its effectiveness and will provide regular reports in this regard to the Directors of Darwen Electrical Services Ltd who have overall responsibility for ensuring this policy complies with our legal and ethical obligations.

Training

We will provide training to all Employees to help them understand their duties and responsibilities under this policy.

Our zero tolerance approach to bribery will also be communicated to all business partners at the outset of the business relationship with them and as appropriate thereafter.

Examples of potential risks

The following is a non-exhaustive list of possible issues which may raise bribery concerns and which an Employee should report in accordance with the reporting procedure set out above:

- a third party insists on receiving a commission or fee before committing to signing a contract with us, or carrying out a government function or process for us
- a third party requests payment in cash, or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made
- a third party requests an unexpected additional commission or fee to facilitate a service
- a third party demands lavish, extraordinary or excessive gifts or hospitality before commencing or continuing contractual negotiations or provision of services
- an Employee is offered an unusually lavish, extraordinary or excessive gift or hospitality by a third party
- an Employee is receive an invoice from a third party that appears to be non-standard or extraordinary
- We are invoiced for a commission or fee payment that appears large given the service stated to have been provided

This policy will be clearly communicated to all Employees and subject to review on an annual basis.

End of Document

Policy review date May 2025