

## Anti-Bribery Policy

Bribery is a serious criminal offence and corrupt acts expose the Employer and its employees to the risk of prosecution, fines and imprisonment, as well as endangering the Company's reputation. R.F.Gardiner Limited are committed to the prohibition of such conduct. This is not just a cultural and moral commitment on the part of the organisation; it is a legal requirement.

The Company has a strict anti-bribery and corruption policy in line with the Bribery Act (2010). A bribe is defined as: giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for having already done so.

If you bribe (or attempt to bribe) another person, intending either to obtain or retain business for the company, or to obtain or retain an advantage in the conduct of the company's business this will be considered gross misconduct. Similarly accepting or allowing another person to accept a bribe will be considered gross misconduct. In these circumstances you will be subject to formal investigation under the Company's disciplinary procedures, and disciplinary action up to and including dismissal may be applied.

If you are found to have committed an act of Bribery, the authorities will also be notified.



**Chris Gardiner**  
Managing Director

15<sup>th</sup> February 2022

