

ANTI-BRIBERY POLICY

Aims and objectives	Tusk Lifting wishes to conduct all business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our dealings wherever we operate. We are also committed to implementing and enforcing effective systems to counter bribery.
Purpose and scope	This procedure applies to all employees, apprentices, workers and anyone else who has a contract to carry out work for Tusk Lifting personally. It does not apply to genuinely self-employed workers who run a profession or business on their own account, an agent or other person or body, unless they are acting on our behalf. The procedure does not give contractual rights to individual employees. We reserve the right to alter any of its terms at any time although we will notify you in writing of any changes.
Definition	Bribery is the giving or promising someone anything of value to unduly get special treatment or improperly influence decision making. Anything valuable includes (but is not limited to) cash, gifts, trips, vouchers, tickets, accommodation, entertainment, products and services. Note that the "value" might go to someone else like a family member or business intermediary.
Gifts and Hospitality	This policy does not prohibit giving and receiving promotional gifts of low value and normal and appropriate hospitality. However, in certain circumstances gifts and hospitality may amount to bribery. We will not provide gifts or hospitality with the intention of persuading anyone to act improperly or to influence an official in the performance of his or her duties. This policy is not meant to prohibit payment for a service that is available to everyone, e.g. fast track passport service or a fee to get a visa processed quickly. See the Gifts and Corporate Hospitality Policy for more detail.
Donations	We do not make contributions of any kind to political parties. No charitable donations will be made for the purpose of gaining any commercial advantage. All charitable donations require the prior approval of the Managing Director.
When in doubt...	Ask yourself the following questions: <ul style="list-style-type: none"> • Is it legal? • Is it in line with our values, policies and guidelines? • Would I feel comfortable discussing this beforehand with my family and manager? • Do I want to read about it in the newspaper? • Do I accept full personal responsibility for the decision?
Record Keeping	We keep financial records and have appropriate internal controls in place which will evidence the business reason for making any payments to third parties. All expense claims relating to hospitality, gifts or expenses incurred to third parties must be submitted in accordance with our Expenses Policy and specifically record the reason for the expenditure. All accounts, invoices, credit notes, letters and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, must be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.
Queries and Concerns	In all instances, employees are encouraged to raise their concerns about issues or suspicion of malpractice regarding this policy at the earliest possible stage, in confidence with their manager or Human Capital or a Director, to allow us the chance to deal with them. You should not bypass this procedure and air concerns externally. Whilst the company would always prefer to have the opportunity to investigate any issues first, another form of raising a concern would be through following the Whistleblowing Policy. No employee will suffer any detriment as a result of raising genuine concerns about bribery, even if they turn out to be mistaken. Remember also that social media sites such as YouTube and Facebook are public rather than private spaces, and they are not the appropriate channel for raising concerns.

Approval, Retention and Issue Details

Document available as read only from the following location:

C: Tusk Lifting\2. ISO\2. Company Policies\ CP02 Anti-Bribery Policy

Review Frequency:

Every 3 years unless statutory, audit, incident or non-compliance require otherwise

Retention: Controlled printed copies destroyed when superseded. Electronic copy held for 5 years unless statutory required or contractually requested to hold beyond this period.

Issue	Details	Author	Approval	Date
1	Document Control	David Hall	Kevin Chalmers	4 th May 2022