

F R Shadbolt & Sons Ltd

Anti-Bribery Policy

1. The Directors of F R Shadbolt & Sons Limited are committed to ensuring that their business operate with the upmost integrity and they conduct their business in an open and honest manner and without using acts of bribery to gain an unfair advantage.
2. F R Shadbolt & Sons Ltd and those employed by them will not:
 - a. Offer, promise of pay bribes to anyone
 - b. Request, agree to accept or receive bribes.
3. F R Shadbolt & Sons Ltd has policies and procedures in place within their business to prevent, deter and defect bribery:
 - a. The Directors of F R Shadbolt & Sons Ltd have zero tolerance bribery;
 - b. Risk assessments are carried out to identify and monitor potential bribery risks;
 - c. Vetting procedures are in place and rigorously carried out to review and approve third parties performing services on their behalf;
 - d. Compulsory training is provided for all existing and new employees and they will be encouraged to speak up if they have concerns without fear of reprisals.
 - e. The Directors will ensure that anti-bribery programmes are regularly monitored and reviewed to maintain their effectiveness.
 - f. Failure by employees to observe this policy will be in breach of the terms of their employment contract and subject to disciplinary procedures.
4. F R Shadbolt & Sons Ltd will work with regulators, government and others to stamp out demands for facilitation payments when conducting business at home and abroad.
5. The prevention detection and reporting bribery is the responsibility of each employee of F R Shadbolt & Sons Ltd or other group company and employees must report any activity or conduct which they suspect maybe a bribe to their line manager, company secretary or the legal department.
6. F R Shadbolt & Sons Ltd and its associated companies recognise that hospitality that is given and received that is reasonable, proportionate and made in good faith is acceptable. F R Shadbolt & Sons Ltd will monitor entertainment and hospitality provided to its client to ensure that it is proportionate. Employees must register any invitations they accept ensuring that their line manager is made aware of the entertainment offered and accepted.

Signed:



Dated:

13-1-20

Mr Simon Shadbolt – Managing Director.

