



Anti-Bribery Policy

D.B Brickwork Ltd values its reputation and is committed to maintaining the highest level of ethical standards in the conduct of its business affairs. The actions and conduct of the company's employees as well as others acting on behalf of the company are key to maintaining these standards.

The purpose of the policy is to set out how we will ensure that bribery and corruption does not occur within our business. The policy applies strictly to all D.B Brickwork Ltd Employees and Director.

Understanding and Recognising Bribery and Corruption

Acts of bribery and corruption are designed to influence an individual in the performance of their duty and encourages them to act in a way that a reasonable person would consider to be dishonest in the circumstances. Bribery can be defined as offering, promising or given a financial (or other) advantage to another person with the intention of inducing or rewarding that person to act or having acted in a way which a reasonable consider improper in the circumstances. Corruption is any form of abuse of entrusted power for private gain and may include bribery.

Bribes are not always a matter of handing over cash. Gifts or other means of hospitality can be deemed as bribes if they are intended to influence a decision.

The Bribery Act 2010 came into force on the 1st July 2011. Under the act bribery by individuals in punishable by up to 10 years in prison or an unlimited fine. If the company is found to have taken part in bribery or if found to lack adequate procedures to prevent bribery it could also face an unlimited fine.

A conviction for a bribery or corruption would have severe reputational and / or financial consequences for the company. D.B Brickwork Ltd will not tolerate bribery or corruption in any form.

The company prohibits offering or giving or accepting of any bribes, corruption or inducement in any form:

- To or from any person or company where ever located whether a public official or public body, or a private person or company
- By an individual employee, director, consultant, contractor or other person or body acting on the companies behalf
- In order to gain any commercial or contractual advantage for the company in any way which is unethical or to gain any personal advantage

This policy is not intended to prohibit the following practices providing they are appropriate, proportionate and accurately recorded:

- Fast tracking a process which is available to all on the payment of a fee
- Providing resources to assist a person or body to make a decision more efficiently provided that it is for this purpose only

It may not always be a simple matter to determine whether a possible cause of action is appropriate. If you are in any doubt as to whether a possible act might be in breach of either this policy or the law the matter should be referred to the Managing Director.



The company will investigate thoroughly any actual or suspected breach of this policy. Any employees who may be found to be in breach of this policy may be subject to disciplinary which may ultimately result in their dismissal.

Key Risk Areas

Bribery can be a risk in many areas of the company. Below are the key areas that our employees should be aware of:

- Excessive Gifts, Entertainment or Hospitality
- Facilitation payments which are used by businesses or individuals to secure the performance of a routine action which the payer has an entitlement as of right
- Reciprocal payments or any other form of “quid pro quo” are never acceptable unless they are legitimate business arrangements which are properly documented and approved by the Managing Director. Improper payments to obtain new business, retain existing business or secure an improper advantage should never be made or accepted
- Appropriate due diligence should always be undertaken before a third party is engaged. Third parties should only be engaged where there is a clear business rationale for doing so with an appropriate contract. Any payments made should be properly authorised and recorded
- Record keeping can be exploited to conceal bribes and corrupt practices. As a business we must ensure that we have robust controls in place to ensure all records are accurate and transparent

The prevention, detection and reporting of any bribery or corruption is the responsibility of everyone who works for the business. If anyone becomes aware or suspect that an activity or conduct which is proposed or has taken place is a bribe or corrupt action then you have a duty to report this to the Managing Director.

Managing Director

4th August 2020