

Anti-Bribery and Corruption Policy

Steve J Martin Ltd

Purpose: This policy outlines Steve J Martin Ltd's commitment to preventing bribery and corruption. It establishes the framework for anti-bribery and corruption management within our organization.

Scope: This policy applies to all employees, contractors, and visitors to our workplace, as well as our activities in all sectors.

Policy Statement: Steve J Martin Ltd is committed to:

- Complying with all applicable anti-bribery and corruption laws and regulations.
- Prohibiting bribery and corruption in all business dealings.
- Promoting ethical business practices.
- Continuously improving our anti-bribery and corruption practices.

Prohibited Conduct:

- Bribery: Offering, giving, receiving, or soliciting anything of value to or from a public official or other person in order to influence their actions.
- Corruption: Engaging in corrupt practices, such as extortion, embezzlement, or fraud.

Due Diligence:

- We will conduct due diligence on our business partners to assess and address risks of bribery and corruption.
- This will include:
 - Identifying potential risks in our supply chains and business relationships.
 - Conducting risk assessments of business partners.
 - Implementing measures to address identified risks.
 - Monitoring and reviewing business partner performance.

Gifts and Hospitality:

- We will have clear guidelines on the acceptance and giving of gifts and hospitality.
- Gifts and hospitality will be accepted or given only if they are reasonable and comply with applicable laws.

Record-Keeping:

- We will maintain accurate and complete records of all business transactions.
- Records will be retained for a specified period in accordance with legal requirements.

Training and Awareness:

- We will provide training and awareness-raising activities to our employees on anti-bribery and corruption.
- This will include information on:
 - What bribery and corruption are
 - How to identify and report potential cases
 - The importance of ethical business practices

Reporting and Investigation:

- We will have a reporting mechanism in place for employees and suppliers to report any concerns about bribery or corruption.
- Any reported incidents will be investigated promptly and confidentially.
- Appropriate action will be taken if a complaint is found to be justified.

Responsibilities:

- **Management:**
 - Develop and implement anti-bribery and corruption policies and procedures.
 - Ensure adequate resources are allocated for anti-bribery and corruption initiatives.
 - Monitor and review anti-bribery and corruption performance.
 - Investigate incidents of bribery and corruption to identify root causes and prevent recurrence.
- **Supervisors:**
 - Ensure that employees are aware of and comply with anti-bribery and corruption procedures.
 - Report any suspected incidents of bribery or corruption.
 - Provide training and supervision as necessary.
- **Employees:**
 - Comply with anti-bribery and corruption policies and procedures.
 - Report any suspected incidents of bribery or corruption.
 - Participate in anti-bribery and corruption training.

Review and Improvement:

- This policy will be reviewed annually to ensure its effectiveness.
- We will continuously improve our anti-bribery and corruption practices.

Steve Martin
Company Director

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