

TRANSPORTATION YOU CAN RELY ON

P10 – Anti-Bribery and Corruption Policy

01.08.2021



P10 – Anti-Bribery and Corruption Policy

McLanachan Transport Limited believes that certain principles and values are the foundation of sound and fair business practice and as such, are essential to uphold.

One such principle is a **zero-tolerance position concerning bribery and corruption**, wherever and in whatever form someone encounters it.

It is important to uphold our sound reputation for ethical behaviour, financial integrity and reliability. In support of this aim, we intend to limit our exposure to bribery and corruption by:

- **Setting out a clear anti-bribery & corruption policy**
- **Encouraging employees to be vigilant and to report any suspicion of corruption, ensuring sensitive information is treated appropriately**
- **Rigorously investigating instances of alleged bribery**
- **Taking action against any individual(s) involved in bribery or corruption**

What is Bribery?

A bribe does not need to be actual money. It can be any form of advantage; offered, requested or received. A contract does not need to have been won for a corruption offence to take place.

Similarly, a recipient does not need to benefit personally from a bribe – it may be the intended beneficiary is a third party or a company.

Finally, bribery can occur in the private as well as the public sector – it is not just about our relationship with public officials.

Policy

This policy has two straightforward rules that all employees, consultants and agents must adhere strictly to:

- **Do not offer, promise or pay bribes**
- **Do not request, agree to or accept bribes**

This policy applies to individual employees, customers, suppliers or any other people or bodies associated with the company.

Report concerns - employee responsibility

The prevention, detection and reporting of bribery is the responsibility of all McLanachan Transport Limited employees.

Suitable channels of communication by which employees or others can confidentially report any suspicion of bribery will be maintained. Any employees suspected of involvement in bribery or corruption will be subject to the disciplinary procedure.



Approved by:

Damian McLanachan

Managing Director

McLanachan Transport

Date: 01.08.2021