



Introduction

Blara Safety UK Ltd (“the Company”) is committed to instilling a strong anti-corruption culture and to upholding all laws relevant to countering bribery and corruption, including, but not limited to, the Bribery Act 2012.

Purpose and Scope

This policy applies to all employees, agents, contractors, subcontractors, consultants, business partners and any other parties (including individuals, partnerships and bodies corporate) associated with the Company or any of its subsidiaries.

The purpose of this policy is to set out the responsibilities in observing and upholding the Company’s position on bribery and corruption and to provide information and guidance to those working for the Company on how to recognise and deal with bribery and corruption issues.

Bribery

A bribe is an inducement or reward, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. The Company expressly prohibits the offering, the giving, the solicitation or the acceptance of any bribe, whether cash or other inducement to or from any person or company, wherever they are situated and whether they are a official or body or private person or company by any individual employee, agent or other person or body acting on the Company’s behalf in order to gain any commercial, contractual or regulatory advantage for the Company in a way which is unethical or in order to gain any personal advantage, pecuniary or otherwise, for the individual or connected with the individual.

Offering Gifts and Hospitality

It is the company’s custom and nature of business to provide hospitality to customers, suppliers and other persons during the normal course of business. Where this hospitality is likely to exceed £20 advanced approval of a Director is required.

No party may offer any gift to anyone without the advanced express permission of a Director.

The Company will keep appropriate financial records evidence the business reason for making payments to third parties, gifts or hospitality.

Expenses

All parties must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with the Company’s expenses policy and specifically record the reason for the expenditure.

Receiving Gifts and Hospitality

All parties must:

- report all gifts or hospitality offered, however small, even if declined, to a Director and a written record kept.
- obtain written approval from a Director before accepting any hospitality invitation.

Political and Charitable Donations

The Company does not make contributions of any kind to political parties.



ANTI BRIBERY POLICY

No charitable donations will be made by the Company for the purpose of gaining any commercial advantage. No party may make any donation to charity on behalf the company. The Directors are solely responsible for any charitable donations and appropriate receipts and records shall be kept.

Training

Training on this policy will form part of the induction process when employees; agents, contractors, subcontractors, consultants, business partners and any other parties associated with the Company begin employment with the Company. Existing employees will receive regular and relevant training on this policy when required.

Should any employee require any additional training in respect of this policy or the requirements of the Bribery Act 2012, they should inform a Director.

All employees, or any of its subsidiaries are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing.

The Company welcomes comments and suggestions with regard to improving the policy and its effectiveness.

Responsibility

It is the responsibility of all employees, agents, contractors, subcontractors, consultants, business partners and any other parties associated with the Company or any of its subsidiaries to ensure that this policy is read, understood and complied with; to prevent, detect and report any acts or suspected acts of bribery or corruption; to avoid any activity that might lead to or suggest a breach of this policy; to exercise due diligence at all times when dealing with third parties on behalf of the Company. All parties must notify a Director as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future and in the case of employees, their normal point of contact within the Company.

Disciplinary Action

Any breach of this policy will be dealt with by the Company's disciplinary procedure and could result in dismissal for gross misconduct.

Policy Review

This policy will be reviewed annually, or sooner following experience or because of operational or organisational changes.

Signed on behalf of the Company:

Managing Director - January 2020