



Zero Tolerance on Bribery and Corruption

Anti-Bribery & Anti-Corruption-Statement

Introduction:

Mechtronic is committed to ensuring that the company meets its legal obligations and prevents, detects and eliminates corrupt practices, and cooperates to reduce opportunities for bribery and corruption.

Mechtronic requires all staff at all times to act honestly and with integrity and to safeguard the resources for which they are responsible.

Mechtronic does not tolerate any form of corruption (including the giving and receiving of bribes) within the organisation and takes the most serious view of any attempt to commit corrupt practices by members of staff, contractors, agents and business partners. Cases of suspected corruption will be properly investigated and appropriate action taken, including reporting to the appropriate authorities, disciplinary action, prosecution and active pursuit of recovery.

All management and staff are actively encouraged to report all cases of suspected corruption either to their line manager or another member of management.

This Policy has been adopted and endorsed by senior management and is to be communicated to everyone in our business to ensure their commitment to it. Our senior management attaches the utmost importance to this Policy and as stated above will apply a "zero tolerance" approach to acts of bribery and corruption by any of our employees or by business partners working on our behalf, including advisors, agents or contractors.

Mechtronic also expects that all interested parties dealing with us apply the highest ethical standards in their business relationships.

Any breach of this Policy will be regarded as a serious matter and is likely to result in disciplinary action.

Bribery:

Includes, but is not limited to, the promising or granting or the requesting or receiving of benefits in money or money's worth to a person with the aim of influencing that person in order to obtain business improperly or to gain an improper advantage. It is the offer, promise, giving, demanding or acceptance of an advantage as an inducement for an action which is illegal, unethical or a breach of trust. The most obvious form of inducement is the giving / offer of money, goods or an advantage, but it can include the promise of favours in the future.

Corruption:

Is the misuse of public office or power for private gain; or misuse of private power in relation to business.

Application of the Policy:

This Policy is not intended to prohibit hospitality practices which are proportionate, properly recorded and lawful. Practices that are aimed at establishing/strengthening relationships with suppliers and customers and promoting products and services, must be carried out in moderation, be transparent and not place any expectation on the recipient to reciprocate either by performing, or failing to perform, any other task in return.

**Employee Responsibility:**

Each person within our organisation has a duty to speak out against suspected acts of bribery or corrupt practices. Everyone has a responsibility to help prevent, detect and report instances of suspected bribery and wrong doing.

Mechtronic believes that it is essential to create an environment in which everyone feels that they can raise any matters of genuine concern without fear of disciplinary action being taken against them or fear of reprisal. We will ensure that all cases of suspected bribery are dealt with consistently and whether or not an investigation shows bribery exists; there will be no retaliation against or adverse consequences for the person reporting the possible case of bribery.

Policy on Accepting Gifts and Entertainment

Mechtronic is committed to undertaking business fairly and with honesty and transparency.

We appreciate that there are occasions when we may be offered or accept gifts and/or invitations for meals or events.

It is more important than ever to secure that we prevent any suspicion of corruption or misuse of company assets effectively. In order to ensure that gifts/invitations are only accepted appropriately the following guidance must be followed:

Accepting invitations to Lunch, Dinner and/or Social Events offered by Third Parties

Mechtronic staff members may only accept entertainment from business partners if:

- It is reasonable, proportionate and made in good faith to improve the image of a commercial organisation, better present products and services, or establish cordial relations (ie: legitimate business purposes).
- It is not given or does not create the appearance of being given as a bribe, payoff, to obtain or retain business, or to secure an improper advantage
- It does not create the appearance that the giver is entitled to preferential treatment, is trying to obtain an improper or unfair advantage through the invitation or is conditional upon receiving anything in return for accepting the entertainment
- Is reasonable and appropriate in the context of the business occasion

It is never appropriate to accept the following:

- Any events that would undermine or damage the reputation of the company, eg. adult entertainment, gambling etc
- Invitations that the recipient knows the giver is not permitted to give
- Invitations otherwise denied or previously denied by Mechtronic management
- Invitations made during a tender process.

Accepting Travel Offered by Third Parties

Infrequently it may be appropriate for third parties to pay for travel-related expenses for Mechtronic staff. Offers of travel must be approved by your manager who should have regard to:

- The primary purpose of the travel must be business related
- Itinerary minimises side trips and limits tourist destinations
- Travel offered for family members is only allowed at the discretion of senior management.

If in doubt, employees should contact their direct line manager.

Accepting Gifts

It is reasonable to accept gifts such as promotional pens, notebooks small Christmas/promotional gifts etc.. If you are unsure you should ask for advice from your line Manager



- Gifts ,where practicable should be used to benefit all employees, e.g. as prizes in a Christmas raffle or donated to a non-profit organization. Perishable goods (e.g. chocolate, fruits, Flowers etc.) shall, where practicable be divided amongst all team members or used as decoration for community spaces/offices.
- All Gifts should be reasonable, proportionate and made in good faith to improve the image of a commercial organisation, better present products and services, or establish cordial relations (ie: legitimate business purposes).
- It is not given or does not create the appearance of being given as a bribe, payoff, to obtain or retain business, or to secure an improper advantage
- It does not create the appearance that the giver is entitled to preferential treatment or is trying to obtain an improper or unfair advantage through the invitation or is conditional upon receiving anything in return for accepting the entertainment

It is never appropriate to accept the following:

- Gifts of gratuities or other items personally requested by staff members that would benefit them personally, regardless of value.
- Gifts given during a tender process
- Gifts of cash or cash equivalent (such as gift cards or certificates)
- Gifts that the recipient knows the giver is not permitted to give
- Gifts otherwise denied or previously denied by your management

Gifts received at an event or of a ceremonial nature that might not be appropriate under these guidelines, but would be impractical or offensive to refuse at the time, may be accepted and then reported to your manager. You and your manager should then discuss the appropriate response.

Staff are expected to exercise good judgement when accepting gifts and staff should speak to their manager if they are in any doubt.

Examples of what is acceptable to accept:

- **TRAVEL** – Short stays in appropriate hotels for business purposes is acceptable. It is permitted to do a short amount of sight-seeing when traveling, but this must not be the primary purpose of the travel. Travel can include appropriate hospitality such as drinks and dinners, but you must have regard to our policy on accepting gifts and entertainment above. Invitations must not be conditional upon receiving anything in return eg: agreement of a business transaction or subject to a contract being awarded.
- **GIFTS** – Small, low value gifts, such as chocolates, alcohol and food hampers can be accepted but must be declared to your manager and where practicable, and under the guidance of your line manager, be distributed for the benefit of your colleagues or donated to charity/for a raffle. Gift vouchers or cash gifts cannot be accepted. Acceptance of gifts must not be conditional upon receiving anything in return eg: agreement of a business transaction or subject to a contract being awarded.
- **Entertainment/invitations** – Invitations to corporate events, such as sporting events, dinners & industry events may be accepted provided that you have approval from your line manager, invitations are not excessive and acceptance of invitations is not conditional upon receiving anything in return eg: agreement of a business transaction or subject to a contract being awarded.

In the first instance Contact your line Manager or alternatively the Managing Director to report a breach of this policy. Your details will remain confidential.

Bribery is just not worth the Risk

Approved..........Dated.....February 2023...