



**GLENS REMOVALS & STORAGE**

**ANTI-BRIBERY**

**POLICY**

## ***Introduction***

Glens Removal & Storage's policy is to conduct all of our business in an honest and ethical manner. We uphold our core values of being responsible and fair business practitioners. Wherever we may operate, we are committed to doing so lawfully, ethically and with integrity. We completely condone any acts or approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships. This policy is designed to help our clients, associates and employees to familiarise with our anti-bribery and anti-corruption systems.

This Policy applies to all permanent and temporary employees of the Company (including any of its intermediaries, subsidiaries or associated companies). It also applies to any individual or corporate entity associated with the Company or who performs functions in relation to, or for and on behalf of, the Company, including, but not limited to, directors, agency workers, casual workers, contractors, consultants, seconded staff, agents, suppliers and sponsors. All employees and associated persons are expected to adhere to the principles set out in this Policy.

## ***Purpose and scope of Policy***

This Policy sets out the Company's position on any forms of bribery and corruption and provides guidelines aimed at:

- Setting out our responsibilities and of those working for us, in observing and upholding our position on bribery and corruption; and
- To provide information and guidance to employees and persons associated with the Company's position and to understand the risks associated with bribery and corruption.
- To ensure compliance of all stakeholders with the company's anti-bribery laws, rules and regulations when dealing with the company.
- providing appropriate and secure reporting structures to enable information from all those in association with the company to report freely without fear
- creating and maintaining a rigorous and effective framework for dealing with any

### *Policy statement*

All employees and associated persons are required to:

- comply with any anti-bribery and anti-corruption legislation that applies in any jurisdiction in any part of the world in which they might be expected to conduct business
- act honestly, responsibly and with integrity
- safeguard and uphold the Company's core values by operating in an ethical, professional and lawful manner at all times.

Bribery of any kind is strictly prohibited. Under no circumstances should any provision be made, money set aside or accounts created for the purposes of facilitating the payment or receipt of a bribe.

For the Company's rules and procedures in relation to the receipt of business gifts from third parties and corporate hospitality offered to or received from third parties, please refer to the Company's Human Resources Director.

#### Gifts from Clients

The giving or receipt of gifts is not prohibited, if the following requirements are met:

- it is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
- it complies with local law;
- it is given in the Company's name, not in the giver's personal name
- it does not include cash or a cash equivalent (such as gift vouchers)
- it is of an appropriate and reasonable type and value and given at an appropriate time
- it is given openly, not secretly

The company's position on gifts is that it is not acceptable to give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given, or to accept a payment, gift or hospitality from a third party that you know or suspect is offered or provided with the expectation that it will obtain a business advantage for them..

### ***Responsibilities and reporting procedure***

It is the contractual duty and responsibility of all employees and associated persons to take whatever reasonable steps are necessary to ensure compliance with this Policy and to prevent, detect and report any suspected bribery or corruption in accordance with the procedure set out in the Company's Disclosures in the Public Interest Policy. You must immediately disclose to the Company any knowledge or suspicion you may have that you, or any other employee or associated person, has plans to offer, promise or give a bribe or to request, agree to receive or accept a bribe in connection with the business of the Company. For the avoidance of doubt, this includes reporting your own wrongdoing. The duty to prevent, detect and report any incident of bribery and any potential risks rests not only with the directors of the Company but equally to all employees and associated persons.

The Company encourages all employees and associated persons to be vigilant and to report any unlawful conduct, suspicions or concerns promptly and without undue delay so that investigation may proceed and any action can be taken expeditiously. In the event that you wish to report an instance or suspected instance of bribery, you should follow the steps set out in the Company's Disclosures in the Public Interest Policy. Confidentiality will be maintained during the investigation to the extent that this is practical and appropriate in the circumstances. The Company is committed to taking appropriate action against bribery and corruption. This could include either reporting the matter to an appropriate external government department, regulatory agency or the police and/or taking internal disciplinary action against relevant employees and/or terminating contracts with associated persons.

The Company will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. It is also committed to ensuring nobody suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or corruption offence has taken place or may take place in the future.

### ***Record keeping***

All accounts, receipts, invoices and other documents and records relating to dealings with third parties must be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off the record" to facilitate or conceal improper payments.

### ***Sanctions for breach***

A breach of any of the provisions of this Policy will constitute a disciplinary offence and will be dealt with in accordance with the Company's disciplinary procedure. Depending on the gravity of the offence, it may be treated as gross misconduct and could render the employee liable to summary dismissal.

As far as associated persons are concerned, a breach of this Policy could lead to the suspension or termination of any relevant contract, sub-contract or other agreement.

### ***Monitoring compliance***

The Company's directors are responsible for ensuring compliance with this Policy and will review its contents on a yearly basis. They will be responsible for monitoring its effectiveness and will provide regular reports in this regard to the shareholders of the Company who have overall responsibility for ensuring this Policy complies with the Company's legal and ethical obligations.

### ***Training***

The Company will provide training to all employees to help them understand their duties and responsibilities under this Policy. The Company's zero tolerance approach to bribery will also be communicated to all business partners at the outset of the business relationship with them and as appropriate thereafter.

Training will be provided to all employees throughout the company to support and equip them in complying with their responsibilities. Training on this policy forms part of the orientation process for all new employees. All existing employees will receive regular training on the details of this code no less than twice a year.

In addition, all employees will be required to confirm that they have understood and complied with the policy annually.