



PO 005 ANTI FRAUD & BRIBERY POLICY

Agricultural Requisites & Mechanizations Limited is committed to minimising financial crime and in particular to preventing, detecting, investigating and reporting fraud and bribery.

Agricultural Requisites & Mechanizations Limited conducts its business with honesty and integrity and as a result promotes an organisational culture from the top down that will not tolerate any act of fraud or bribery.

This policy is designed to reduce the risk within Agricultural Requisites & Mechanizations Limited of fraud, bribery and other criminal acts being committed by employees, customers, suppliers and all other stakeholders and if such acts are committed, such acts then going unreported. This policy should be read in conjunction with the Whistle Blowing Policy.

This policy applies to all persons employed or engaged by Agricultural Requisites & Mechanizations Limited and all suppliers and customers.

Introduction

Bribery is a criminal offence. The Company prohibits any form of bribery. We require compliance, from everyone connected with our business, with the highest ethical standards and anti-bribery laws applicable. Integrity and transparency are of utmost importance to us and we have a zero tolerance attitude towards corrupt activities of any kind, whether committed by employees or by third parties acting for or on behalf of the Company.

Policy summary

It is prohibited, directly or indirectly, for any employee or person working on our behalf to offer, give, request or accept any bribe i.e. gift, loan, payment, reward or advantage, either in cash or any other form of inducement, to or from any person or Company in order to gain commercial, contractual or regulatory advantage for the Company, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.

Suspicion

If we suspect that you have committed an act of bribery or attempted bribery, an investigation will be carried out and, in line with our disciplinary procedure where appropriate, action may be taken against you which may result in your dismissal, or the cessation of our business arrangement with you.

Reporting

If you, as an employee or person working on our behalf, suspect that an act of bribery or attempted bribery has taken place, even if you are not personally involved, you are expected to report this to a Senior Manager. You may be asked to give a written account of events.

Staff are reminded of the Company's Whistleblowing Policy which is available in this Employee Handbook.

Gifts and hospitality

We realise that the giving and receiving of gifts and hospitality as a reflection of friendship or appreciation where nothing is expected in return may occur, or even be commonplace, in our industry. This does not constitute bribery where it is proportionate and recorded properly.



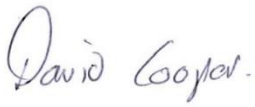
No gift should be given nor hospitality offered by an employee or anyone working on our behalf to any party in connection with our business without receiving prior written approval from your Manager.

Similarly, no gift or offer of hospitality should be accepted by an employee or anyone working on our behalf without receiving prior written approval from your Manager.

Record keeping

A record will be made by your Manager of every instance in which gifts or hospitality are given or received.

As the law is constantly changing, this policy is subject to review and the Company reserves the right to amend this policy without prior notice.

 Signed: _____ David Cooper, Managing Director		Dated 27/05/2020	
Author	Peninsula	Date Doc. Created	27/05/2020
Approved	DJC	Issue	4
Department	HR	Next Review Date	May 2021