

## Anti Bribery and Corruption Policy Statement

A bribe is an inducement or reward offered, promised, or provided in order to improperly gain any commercial, contractual, regulatory, or personal advantage, which may constitute an offence under the Bribery Act 2010. This includes giving or offering a bribe and receiving or requesting a bribe.

Good business ethics are integral to Caswells' working practices. All persons working for or on behalf of the organisation shall work in a safe, ethical, and lawful manner. They shall be professional and accountable in everything that they do at work. Employees and those working on behalf of the organisation shall not be influenced. Caswells pride ourselves on our independence and impartiality. This means that we will not seek to influence or be influenced by payments of money or anything of value, corporate hospitality, or gifts. It is our company policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and we are committed to acting professionally, fairly, and with integrity in all our business dealings and relationships.

The purpose of this Anti-Bribery and Corruption Policy is to set out our responsibilities, and of those working on our behalf, in observing and upholding our zero-tolerance position on bribery and corruption. It provides information and guidance to those working for us on how to recognise and avoid bribery and corruption.

### Scope and applicability

This policy applies to all individuals working for or on behalf of Caswells, including actual and potential clients, intermediaries, referrers of work, suppliers, distributors, business contacts, agents, advisers, government, and public bodies.

### Gifts and hospitality

This policy does not prohibit normal and appropriate gifts and hospitality (given and received) to or from third parties unless otherwise specifically stated.

What is to be regarded as normal and appropriate gifts and hospitality in terms of financial limits, are defined below.

Gifts and hospitality:

- Shall not be made with the intention of improperly influencing a third party or employee 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.
- Shall be given in the name of the organisation, not in an individual's name.
- Shall not include cash or a cash equivalent.
- Shall be appropriate in the circumstances.
- Shall be of an appropriate type and value and given at an appropriate time taking into account the reason for the gift.
- Shall be given openly and not secretly.

### What is not acceptable?

It is not acceptable for any employee, or persons working on behalf of the organisation to:

- Give, promise to give, or offer a payment, gift or hospitality with the expectation or hope that Caswells will improperly be given a business advantage, or as a reward for a business advantage already improperly given.



- Give, promise to give, or offer a payment, gift or hospitality to a government official, agent, or representative to facilitate or expedite a routine procedure.
- Accept payment from a third party where it is known or suspected that it is offered or given with the expectation that the third party will improperly obtain a business advantage.
- Accept a gift or hospitality from a third party where it is known or suspected that it is offered or provided with an expectation that a business advantage will be improperly provided by Caswells in return.
- Threaten or retaliate against another employee or person working on behalf of the organisation who has refused to commit a bribery offence or who has raised concerns under this policy.
- Engage in any activity that might lead to a breach of this policy.

### **Charitable Donations and Sponsorship**

D R Caswell Limited only makes charitable donations and provides sponsorship that are legal and ethical.

### **Record Keeping**

We keep appropriate financial records and have appropriate internal controls in place which evidence the business reason for gifts, hospitality, and payments made and received.

### **Responsibilities and raising concerns**

The prevention, detection, and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. All persons working either for or on behalf of the organisation are required to avoid any activity that might lead to or suggest a breach of this policy. They are required to notify a member of the Management Team as soon as possible if it is believed or suspected that a conflict with this policy has occurred, or may occur in the future, or if they are offered a bribe, are asked to make one, suspect that this may happen in the future, or believe that they are a victim of another form of unlawful activity.

Any employee who breaches this policy shall face disciplinary action which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with non-employee workers if they breach this policy.

### **Training and Communication**

All employees shall be made aware of this policy. Where necessary, information, instruction and training shall be provided to ensure that their responsibilities and adherence to ethical business working practices are maintained to continue to strengthen the company and its reputation for independence and honest dealings with all those we come into contact with.

This policy shall be maintained as documented information, shall be communicated within the organisation, shall be available to interested parties as appropriate, and regularly reviewed.

*P. Caswell*

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