

Anti-Bribery and Corruption Policy

1. Purpose

Riello UPS Limited (“the Company”) is committed to conducting business **lawfully, ethically, and transparently**. This Policy sets out the Company’s **zero-tolerance approach to bribery and corruption** and establishes the standards of behaviour expected of all individuals working for or on behalf of the Company.

This Policy supports compliance with:

- **UK Bribery Act 2010**
- **ISO 9001 – Quality Management Systems**
- **ISO 27001 – Information Security Management**

2. Scope

This Policy applies to:

- All employees, directors, and officers of Riello UPS Limited
- Contractors, agents, intermediaries, and other associated persons

It applies to all business activities carried out in the UK and overseas on behalf of the Company.

3. Policy Statement

Bribery and corruption in any form are **strictly prohibited**.

No person covered by this Policy may:

- Offer, promise, give, request, or accept a bribe
- Make or accept facilitation payments
- Use gifts, hospitality, donations, or sponsorship to influence business decisions

Breaches may result in disciplinary action, contract termination, and criminal prosecution.

4. What Is Bribery

A bribe is any **financial or other advantage** offered, given, requested, or received with the intention of inducing **improper performance** of a function or activity.

This includes both public and private sector bribery.

5. Gifts, Hospitality, Donations and Sponsorship

Gifts, hospitality, donations, and sponsorship must:

- Be reasonable and proportionate
- Never influence, or appear to influence, business decisions
- Be declared, approved, and recorded

All such matters are governed by the **Gifts, Hospitality, Donations and Sponsorship Policy**.

6. Third Parties and Supply Chain

The Company may be held liable for bribery committed by third parties acting on its behalf.

All third parties must:

- Be subject to proportionate due diligence
- Comply with the **Code of Integrity for Business Partners**
- Adhere to contractual anti-bribery requirements

7. Reporting Concerns

Any concerns or suspicions of bribery or corruption must be reported immediately via:

- A line manager
- Finance or HR
- The **Whistleblowing Policy**

Reports made in good faith will be treated confidentially and without retaliation.

8. Breaches and Consequences

Breaches of this Policy may result in:

- Disciplinary action (employees)
- Contract termination (third parties)
- Referral to law enforcement authorities

9. ISO Compliance and Management System Integration

This Policy forms part of the Company's **Integrated Management System (IMS)** and supports:

- **ISO 9001** – risk-based thinking and control of external providers
- **ISO 27001** – ethical conduct and supplier risk management

Compliance is monitored through audits, management review, and corrective action processes.

10. Governance

The **Managing Director** has overall accountability for this Policy.

11. Related Policies

- Ethics Policy
- Gifts, Hospitality, Donations and Sponsorship Policy
- Purchasing & Sustainable Procurement Policy
- Code of Integrity for Business Partners
- Disciplinary Policy and Procedure
- Whistleblowing Policy

12. Policy Review

The Policy will be reviewed regularly by the Managing Director to ensure continued legal, ethical, and ISO compliance.