Anti-bribery policy

Introduction

Solar Gates UK values its reputation for ethical behaviour and for financial probity and reliability. It recognises and supports the Bribery Act 2010. It recognises that over and above the commission of any crime, any involvement in bribery will also reflect adversely on its image and reputation. Its aim therefore is to limit its exposure to bribery by recognising the six principles of the Act:

- Understanding the proportionality of the policy and its impact within the company and its supply chain,
- setting out a clear anti-bribery policy and showing top level commitment,
- Carrying out risk assessments and establishing and implementing anti-bribery procedures as appropriate,
- undertaking appropriate due diligence measures before engaging others to represent Solar Gates UK in its business dealings,
- communicating this policy and any relevant procedures to employees and to others who will perform services for Solar Gates UK,
- monitoring and reviewing the risks and the effectiveness of any anti-bribery procedures that are in place.

Policy

Solar Gates UK prohibits the offering, giving, solicitation or acceptance of any bribe (whether cash or other inducement)

- to or from any person or company (wherever they are situated and whether they are a public official or body or private person or company),
- by any individual employee, agent or other person or body acting on behalf of the Company,
- in order to gain any commercial, contractual or regulatory advantage for Solar Gates UK in a way that is unethical,
- in order to gain any personal advantage (pecuniary or otherwise) for the individual or anyone connected with the individual.

This policy prohibits any inducement that results in a personal gain or advantage to the recipient or any person or body associated with them, and which is intended to influence them to take action that may not be solely in the interests of Solar Gates UK or of the person or body employing them or whom they represent.

This policy is not meant to prohibit normal and appropriate hospitality or the giving of a gift on a festival or at another special time, providing they are customary in a particular market, are proportionate and are properly recorded.

Inevitably, decisions as to what is acceptable may not always be easy. If you are in any doubt as to whether a potential act constitutes bribery, the matter should be referred to the Senior Leadership Team before proceeding.

Employees' responsibility

The prevention, detection and reporting of bribery is the responsibility of all employees and the Company is committed to:

- encouraging employees to be vigilant and to report any suspicion of bribery,
- providing employees with suitable channels of communication and ensuring that sensitive information is treated appropriately,

- investigating instances of alleged bribery and assisting the police and other appropriate authorities in any resultant prosecution,
- taking disciplinary action against any individual(s) involved in bribery.

Any suspicion of bribery should be reported in confidence to any member of the Senior Leadership Team, who have overall responsibility for bribery prevention.

Should any person under the employ of Solar Gates UK be suspected of a breach of this policy, an investigation will take place. This could result in dismissal on the grounds of gross misconduct. Suspension may occur during the investigation.

Solar Gates UK will not conduct business with service providers, agents or representatives who do not support the companies anti bribery objectives.

Should a member of the staff witness wrongdoing, the company will fully support them in reporting this, in accordance with procedures, providing the report is made in good faith.

This policy is approved for use within Solar Gates UK Ltd for a period of 5 years, with amendments as necessary being disseminated to all staff at the time of the change

Date of approval   23/8/24

Name of person approving   Christopher Long

Role of person approving   Operations Director

Signature of person approving