

Anti-Bribery Policy



Bribery and other Corrupt Behaviour

Elmelin Ltd has a strict UK anti-bribery and corruption policy in line with the Bribery Act (2010). A bribe is defined as: giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for having already done so.

If you bribe (or attempt to bribe) another person, intending either to obtain or retain business for the company, or to obtain or retain an advantage in the conduct of the company's business this will be considered gross misconduct. Similarly accepting or allowing another person to accept a bribe will be considered gross misconduct. In these circumstances you will be subject to formal investigation under the disciplinary procedures of Elmelin Ltd, and disciplinary action up to and including dismissal may be applied.

Conflict of Interest

You should not, directly or indirectly, engage in, or have any interest, financial or otherwise, in any other business enterprise which interferes or is likely to interfere with your independent exercise of judgement in the best interest of Elmelin Ltd.

Generally a conflict of interests exists when an employee is involved in an activity:

- Which provides products or services directly to, or purchase products or services from Elmelin.
- Which subjects the employee to unreasonable time demands that prevent the employee from devoting proper attention to his or her responsibilities to Elmelin.
- Which is so operated that the employee's involvement with the outside business activity will reflect adversely on Elmelin.

Should you be in doubt as to whether an activity involves a conflict, you should discuss the situation with your manager.