

Bribery and Corruption Policy

The Bribery Act creates a new offence under section 7 which can be committed by commercial organisations which fail to prevent persons associated with OTL Electrical Services Ltd (OTL) from committing bribery on their behalf.

OTL have adopted the principles proposed by government to ensure that bribery and corruption prevention procedures are in place and implemented through the company management system. The key principles for bribery and corruption prevention are;

1. Risk Assessment

OTL will regularly and comprehensively assess the nature and extent of the risks relating to bribery and corruption to which it is exposed.

2. Top Level Commitment

The top level management of OTL are committed to preventing bribery and corruption. We will establish a culture within the organisation in which bribery and corruption is never acceptable and will take steps to ensure that the organisation's policy to operate without bribery and corruption is clearly communicated to all levels of management, the workforce and any relevant external actors.

3. Due Diligence

OTL has procedures which cover all parties to a business relationship, including the organisation's supply chain, agents and intermediaries, all forms of joint venture and similar relationships and all market's in which OTL do business.

4. Clear, Practical and Accessible Policies and Procedures

Our policies and procedures are implemented to prevent bribery and corruption being committed are clear, practical, accessible and enforceable and take account of the roles of the whole workforce from the Managing Director to all employees, and all people and entities over which the organisation has control.

5. Effective Implementation

OTL will effectively implement our anti-bribery and corruption policies and procedures and ensure they are embedded throughout the organisation. This process ensures that the development of policies and procedures reflects the practical business issues that an organisation's management and workforce face when seeking to conduct business without bribery and corruption.

6. Monitoring and Review

OTL has monitoring and review mechanisms in place to ensure compliance with relevant policies and procedures and identifies any issues as they arise. The organisation implements improvements where appropriate.

7. Whistleblowing

Employees are expected to act with integrity and honesty and to the highest ethical standards at all times. OTL is resolutely opposed to bribery and corruption in whatever form it may take, and all employees are required to ensure OTL's opposition is made clear in all circumstances.

OTL employees can raise any concerns they may have about any workplace fraud or mismanagement on a confidential basis with the Managing Director or Director. Communication will be classified as being in strictest confidence.

Persons who fail to comply with this policy will be reported to the Managing Director and may face disciplinary action.

This policy is included in the SHEQ Information Manual, issued to, and signed by recipients as being read, understood and will comply with this policy.



Signed:

S Edwards

Managing Director

Date: **Jan 2020**