



Anti-Bribery Policy

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Anti-Bribery Policy

Purpose

This policy establishes the responsibilities of Motion Control Products and those who work for the company in regards to observing and upholding our zero-tolerance position on bribery and corruption. It also exists to act as a source of information and guidance for those working for Motion Control Products. It helps to recognise and deal with bribery and corruption issues, as well as understand responsibilities.

Policy Statement

Motion Control Products is committed to conducting business in an ethical and honest manner and is committed to implementing and enforcing systems that ensure bribery is prevented. Motion Control Products has zero-tolerance for bribery and corrupt activities that benefit either individuals or businesses and will not partake in any dealings where the company believes such behaviours occur. Motion Control Products are committed to acting professionally, fairly, and with integrity in all business dealings and relationships, wherever it operates.

Motion Control Products will constantly uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which the company operates. Motion Control Products are bound by the laws of the UK, including the Bribery Act 2010, in regard to its conduct both at home and abroad.

Motion Control Products recognises that bribery and corruption are punishable by up to ten years of imprisonment and a fine. If the company is discovered to have taken part in corrupt activities, it may be subjected to an unlimited fine, be excluded from tendering for public contracts, and face serious damage to its reputation. It is with this in mind that Motion Control Products commit to preventing bribery and corruption within the business, and take its legal responsibilities seriously.

Who Is Covered By The Policy?

This anti-bribery policy applies to all employees (whether temporary, fixed-term, or permanent), apprentices, consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, agents, sponsors, or any other person or persons associated with the company (including third parties), or any of its subsidiaries or their employees, no matter where they are located (within or outside of the UK). The policy also applies to Officers, Trustees, Board, and/or Committee members at any level.

In the context of this policy, third-party refers to any individual or organisation the company meets and works with. It refers to actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies – this includes their advisors, representatives and officials, politicians, and public parties.

Any arrangements Motion Control Products make with third parties are subject to clear contractual terms, including specific provisions that require the third party to comply with minimum standards and procedures relating to anti-bribery and corruption.

Definition of Bribery

Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision.

A bribe refers to any inducement, reward, or object/item of value offered to another individual in order to gain commercial, contractual, regulatory, or personal advantage.

Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law.

Bribery is illegal. Employees must not engage in any form of bribery, whether it be directly, passively (as described above), or through a third party (such as an agent or distributor). They must not bribe a foreign public official anywhere in the world. They must not accept bribes in any

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degree and if they are uncertain about whether something is a bribe or a gift or act of hospitality, they must seek further advice from the company's compliance manager.

What Is and What Is NOT Acceptable

This section of the policy refers to 4 areas:

- Gifts and hospitality
- Facilitation payments
- Political contributions
- Charitable contributions.

Gifts and Hospitality

Motion Control Products accepts normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts meets the following requirements:

- It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits.
- It is not made with the suggestion that a return favour is expected.
- It is in compliance with local law.
- It is given in the name of the company, not in an individual's name.
- It does not include cash or a cash equivalent (e.g. a voucher or gift certificate).
- It is appropriate for the circumstances (e.g. giving small gifts around Christmas or as a small thank you to a company for helping with a large project upon completion).
- It is of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift.
- It is given/received openly, not secretly.
- It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.
- It is not above a certain excessive value, as pre-determined by the company's Operations Director (usually in excess of £100).
- It is not offer to, or accepted from, a government official or representative or politician or political party, without the prior approval of the company's compliance manager.

Where it is inappropriate to decline the offer of a gift (i.e. when meeting with an individual of a certain religion/culture who may take offence), the gift may be accepted so long as it is declared to the Operations Director, who will assess the circumstances.

Motion Control Products recognises that the practice of giving and receiving business gifts varies between countries, regions, cultures, and religions, so definitions of what is acceptable and not acceptable will inevitably differ for each.

As good practice, gifts given and received should always be disclosed to the Operations Director.

Gifts from suppliers should always be disclosed to the Operations Director.

The intention behind a gift being given/received should always be considered.

If there is any uncertainty, the advice of the Operations Director should be sought. Failure to declare an item to the Operations Director could result in disciplinary action which could progress following investigation to dismissal for gross misconduct.

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Facilitation Payments and Kickbacks

Motion Control Products does not accept and will not make any form of facilitation payments of any nature. The company recognises that facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action. The company recognises that they tend to be made by low level officials with the intention of securing or speeding up the performance of a certain duty or action.

Motion Control Products does not allow kickbacks to be made or accepted. Motion Control Products recognises that kickbacks are typically made in exchange for a business favour or advantage.

Motion Control Products recognises that, despite its strict policy on facilitation payments and kickbacks, employees may face a situation where avoiding a facilitation payment or kickback may put their/their family's personal security at risk. Under these circumstances, the following steps must be taken:

- a. Keep any amount to the minimum.
- b. Ask for a receipt, detailing the amount and reason for the payment.
- c. Create a record concerning the payment.
- d. Report this incident to your line manager and Operations Director immediately.

Political Contributions

Motion Control Products will not make donations, whether in cash, kind, or by any other means, to support any political parties or candidates. It recognises this may be perceived as an attempt to gain an improper business advantage.

Charitable Contributions

Motion Control Products accepts (and indeed encourages) the act of donating to charities – whether through services, knowledge, time, or direct financial contributions (cash or otherwise) – and agrees to disclose all charitable contributions it makes.

Employees must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery.

We will ensure that all charitable donations made are legal and ethical under local laws and practices, and that donations are not offered/made without the approval of the Operations Director.

Employee Responsibilities

Employees of Motion Control Products, must ensure that they read, understand, and comply with the information contained within this policy, and with any training or other anti-bribery and corruption information they are given.

All employees and those under our control are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. Employees are required to avoid any activities that could lead to, or imply, a breach of this anti-bribery policy.

If an employee has reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, they must notify the Operations Director immediately.

If any employee breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct. Motion Control Products has the right to terminate a contractual relationship with an employee if they breach this anti-bribery policy.

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What Happens If an Employee Needs To Raise A Concern?

This section of the policy covers 3 areas:

- a. How to raise a concern.
- b. What to do if an employee is a victim of bribery or corruption.
- c. Protection.

How to raise a concern

If an employee suspects that there is an instance of bribery or corrupt activities occurring in relation to Motion Control Products, they are encouraged to raise their concerns at as early a stage as possible.

If they are uncertain about whether a certain action or behaviour can be considered bribery or corruption, they should speak to their line manager, the Operations Director or another member of the Management Team.

Motion Control Products will familiarise all employees with its whistleblowing procedures so employees can vocalise their concerns swiftly and confidentially.

What To Do – Employees as Victims of Bribery or Corruption

Employees must tell the Operations Director as soon as possible if they are offered a bribe by anyone, if they are asked to make one, if they suspect that they may be bribed or asked to make a bribe in the near future, or if they have reason to believe that they are a victim of another corrupt activity.

Protection

If an employee refuses to accept or offer a bribe or they report a concern relating to potential act(s) of bribery or corruption, Motion Control Products understands that an employee may feel worried about potential repercussions. Motion Control Products will support anyone who raises concerns in good faith under this policy, even if investigation finds an employee was mistaken.

Motion Control Products will ensure that no one suffers any detrimental treatment as a result of refusing to accept or offer a bribe or other corrupt activities or because they reported a concern relating to potential act(s) of bribery or corruption.

Detrimental treatment refers to dismissal, disciplinary action, treats, or unfavourable treatment in relation to the concern the individual raised.

If an employee has a reason to believe they have been subjected to unjust treatment as a result of a concern or refusal to accept a bribe, they should inform their line manager or the Operations Director immediately.

Training and Communication

Motion Control Products will provide training on this policy as part of the induction process for all new employees. Employees will also receive regular, relevant training on how to adhere to this policy, and will be asked annually to formally accept that they will comply with this policy.

Motion Control Products' anti-bribery and corruption policy and zero-tolerance attitude will be clearly communicated to all suppliers, contractors, business partners, and any third-parties at the outset of business relations, and as appropriate thereafter.

Motion Control Products will provide relevant anti-bribery and corruption training to employees etc. where it is felt their knowledge of how to comply with the Bribery Act needs to be enhanced. As

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good practice, all businesses should provide their employees with anti-bribery training where there is a potential risk of facing bribery or corruption during work activities.

Record Keeping

Motion Control Products will keep detailed and accurate financial record and will have appropriate internal controls in place to act as evidence for all payments made. They Company will declare and keep a written record of the amount and reason for hospitality or gifts accepted and given, and understand that gifts and acts of hospitality are subject to managerial review.

Implementation, monitoring and review of this policy

This policy will take effect from 1st January 2023. The Managing Director has overall responsibility for implementing and monitoring this policy, which will be reviewed annually or as and when amendments are required, following its implementation.