

DUNSTON (SHIP REPAIRS) LIMITED
ANTI-CORRUPTION POLICY & PROCEDURE

Form Ref.: COM/101

Issue Date: 14/07/23

Issue Status: 1

ANTI-CORRUPTION POLICY & PROCEDURE



1. Policy statement

1.1 This anti-corruption policy exists to set out the responsibilities of Dunston (Ship Repairs) Limited and those who work for us in regards to observing and upholding our zero-tolerance position on bribery and corruption.

1.2 Dunston (Ship Repairs) Limited is committed to conducting business in an ethical and honest manner, and is committed to implementing and enforcing systems that ensure bribery is prevented. Dunston (Ship Repairs) Limited has zero-tolerance for bribery and corrupt activities.

1.3 Dunston (Ship Repairs) Limited will constantly uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which we operate. We are bound by the laws of the UK, including the Bribery Act 2010.

2. Who is covered by this policy?

2.1 This anti-bribery policy applies to all employees (whether temporary, fixed-term, or permanent), consultants, contractors, trainees, agency staff, volunteers, interns, agents or any other person or persons associated with us (including third parties).

3. Definition of Bribery

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

4. What is and what is not acceptable

4.1 This section of the policy refers to 4 areas:

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

4.2 Gifts and hospitality. Dunston (Ship Repairs) Limited 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:

- a. 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.
- b. It is not made with the suggestion that a return favour is expected.
- c. It is in compliance with local law.
- d. It is given in the name of the company, not in an individual's name.
- e. It does not include cash or a cash equivalent, e.g., a voucher or gift certificate.
- f. It is appropriate for the circumstances, e.g., giving small gifts around a holiday or as a small thank you to a company for helping with a large project upon completion.
- g. It is of an appropriate type and value and given at an appropriate time, considering the reason for the gift.
- h. It is given or received openly, not secretly.
- i. It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.

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- j. It is not above a certain excessive value, as pre-determined by the Commercial Director, i.e., in excess of £50.
- k. It is not an offer to, or accepted from, a government official or representative or politician or political party, without the prior approval of the company's Commercial Director.

4.3 As good practice, gifts given and received should always be disclosed to the Commercial Director. Gifts from suppliers should always be disclosed.

4.5 Dunston (Ship Repairs) Limited does not allow kickbacks to be made or accepted. We recognise that kickbacks are typically made in exchange for a business favour or advantage.

4.6 Political Contributions. Dunston (Ship Repairs) Limited will not make donations, whether in cash, kind, or by any other means, to support any political parties or candidates. We recognise this may be perceived as an attempt to gain an improper business advantage.

4.7 Charitable Contributions. Dunston (Ship Repairs) Limited 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. 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 compliance manager.

5. Rules for giving gifts and hospitality

5.1 As an employee of Dunston (Ship Repairs) Limited you must ensure that you read, understand, and comply with the information contained within this policy, and with any training or other anti-bribery and corruption information you are given.

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

5.3 If you have reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, you must notify the Commercial Director.

5.4 If any employee breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct. Dunston (Ship Repairs) Limited has the right to terminate a contractual relationship with an employee if they breach this anti-bribery policy.

5.5 You must declare and keep a written record of all Gifts, Invitations & Hospitality. Any which are accepted or offered are subject to managerial review.

5.6 The prevention, detection, and reporting of any form of Bribery & Corruption are the responsibility of all Employees. You must notify someone within the senior management team as soon as possible if you are offered a bribe, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

5.7 Employees are encouraged to raise concerns about any instance, or suspicion, of malpractice at the earliest possible stage through their line manager or other available reporting mechanisms.

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6. What happens if I have a concern?

6.1 This section of the policy covers 3 areas:

- a. How to raise a concern.
- b. What to do if you are a victim of bribery or corruption.
- c. Protection.

6.2 How to raise a concern: If you suspect that there is an instance of bribery or corrupt activities occurring in relation to Dunston (Ship Repairs) Limited you are encouraged to raise your concerns at as early a stage as possible. If you are uncertain about whether a certain action or behaviour can be considered bribery or corruption, you should speak to your line manager or a director.

6.3 If you have a concern to raise or suspect an instance of bribery or corrupt activities, Dunston (Ship Repairs) Limited encourages employees to submit an anonymous Ethics Complaint Form (COM102), these will be available in a folder within the fitting shop and can be posted through the company letterbox.

6.4 Protection: If you refuse to accept or offer a bribe or report a concern relating to potential act(s) of bribery or corruption, Dunston (Ship Repairs) Limited understands that you may feel worried about potential repercussions. Dunston (Ship Repairs) Limited will support anyone who raises concerns in good faith under this policy, even if investigation finds that they were mistaken.

7. Record keeping

7.1 Dunston (Ship Repairs) Limited will keep detailed and accurate financial records, and will have appropriate internal controls in place to act as evidence for all payments made. We 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.

8. Monitoring and reviewing

8.1 Dunston (Ship Repairs) Limited's Commercial Director is responsible for monitoring the effectiveness of this policy and will review the implementation of it on a regular basis. They will assess its suitability, adequacy, and effectiveness.

8.2 This policy does not form part of an employee's contract of employment and Dunston (Ship Repairs) Limited may amend it at any time to improve its effectiveness at combatting bribery and corruption.

Signed



Commercial Director

Dated

20/07/2023