

## **Anti-Bribery Policy**

### **Key Precision Ltd**

#### **1. Policy Statement**

Key Precision Ltd is committed to conducting business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly, and with integrity in all our business dealings and relationships.

We uphold all laws relevant to countering bribery and corruption, including the **Bribery Act 2010** in the UK.

#### **2. Purpose of This Policy**

The purpose of this policy is to:

- Set out our responsibilities in observing and upholding our position on bribery and corruption.
- Provide guidance to employees, suppliers, contractors, and others working on our behalf on how to recognise and deal with bribery and corruption issues.

#### **3. Scope**

This policy applies to all individuals working at all levels and grades within Key Precision Ltd, including:

- Directors, employees, and apprentices.
- Contractors, consultants, suppliers, and any other third-party representatives.

#### **4. What is Bribery?**

Bribery is the offering, promising, giving, accepting, or soliciting of an advantage as an inducement for action which is illegal, unethical, or a breach of trust.

Examples of bribery include (but are not limited to):

- Offering or accepting cash or gifts in exchange for favourable treatment.
- Making facilitation payments to speed up a routine process.
- Giving a gift to secure a contract or influence a decision.

#### **5. Our Commitment**

Key Precision Ltd will:

- Never offer or accept bribes or facilitation payments.
- Never engage in any form of unethical inducement or payment.
- Uphold anti-bribery laws in all aspects of our operations.

- Train relevant employees on how to identify and report bribery risks.

## **6. Gifts and Hospitality**

We accept that giving and receiving modest, proportionate gifts and hospitality is a part of normal business relationships. However:

- Gifts must never be offered or accepted with the intent to influence a decision.
- Hospitality must be reasonable, infrequent, and not lavish.
- All gifts and hospitality must be recorded and reported to management.

## **7. Responsibilities**

- The **Directors** are responsible for overseeing compliance with this policy.
- **All employees** are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- Employees must report any concerns or suspicions of bribery to a manager or director immediately.

## **8. Reporting and Whistleblowing**

Employees are encouraged to raise concerns about any issue or suspicion of bribery or corruption at the earliest possible stage. Reports will be treated confidentially and without fear of retaliation.

## **9. Consequences of Non-Compliance**

Any employee found to have engaged in bribery will face disciplinary action, which may include dismissal. Breaches of this policy by third parties may result in termination of contracts or relationships.

## **10. Review**

This policy will be reviewed annually and updated as necessary to ensure continued compliance with legislation and best practice.

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**Approved by:**



Greg Jackson

**Position:** Director, Key Precision Ltd

**Date:** 24/3/25

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