

BUSINESS ETHICS POLICY

This policy outlines the responsibilities of staff working for the Company.

Bribery and Other Corrupt Behaviour

- AlderCross Limited has a strict 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 a member of staff bribes (or attempts 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 the member of staff will be subject to formal investigation, and disciplinary action up to and including dismissal may be applied.

Gifts and Hospitality

- AlderCross Limited requires its staff members to ensure that gifts and hospitality offered by suppliers and potential suppliers of goods and services to the Company are declined. This applies, whether the gifts or hospitality are offered within, or outside normal working hours. The only exceptions to this are trivial gifts with a nominal value of less than £10 such as a calendar, diary, chocolates or mugs can be accepted. All other gifts must be politely refused or, if received through the post, returned to the donor or donated to charity.
- The important difference between, for example, attendance in an official capacity at a function organised by the Company and the acceptance of hospitality from a private individual or firm should be recognised.

Confidentiality

- At all times confidentiality must be maintained. No information can be released to unauthorised persons or organisations.
- If doubt exists as to the validity of an organisation or individuals to receive information, this must be checked with the Managing Director.

General Conduct

- Staff should at all times conduct themselves in such a way as to enhance the reputation of the Company.
- AlderCross Limited expects its staff (including temporary, agency, contractor or consultant staff) to be scrupulously impartial and honest in all affairs relating to the Company and their job within it. All staff bear a responsibility to act as ambassadors for the Company in terms of their general conduct both within and outside the organisation. AlderCross Limited demand all staff behave in a fair and respectful manner to others at all times.
- AlderCross Limited will support staff who become aware of and are willing to report breaches of this policy or who genuinely believe that a breach is occurring, has occurred or is likely to occur within the business. Staff should raise any issue internally with the Managing Director at the earliest opportunity.

If you require further information, please contact us by any convenient means:

E-mail: management@aldercross.com Telephone: 01244 537527

Post: AlderCross Ltd, Cholmondeley House, Dee Hills Park, Chester, Cheshire CH3 5AR