

## Bribery, Fraud and Malpractice Policy

### Statement

Stonewest Ltd is committed to carrying out its business fairly, legally and honestly. It is aware of its legal and social responsibilities and will comply with the requirements of the Bribery Act 2010, Enterprise Act 2002 and Competition Act 1998 and other applicable legislation.

The Company has a zero tolerance of and will not take part in any act of bribery, fraud or malpractice. The Company also expects and requires its officers, employees, agents, Clients and suppliers not to be involved in any act of bribery, fraud and malpractice.

Bribery is seen as, but may not be limited to, any act which involves the transfer of benefit between the Company, organisation(s) or person(s) for the purpose of obtaining influence to obtain advantage.

Fraud is seen as, but may not be limited to, collusion between the Company, other organisation(s) or person(s) with the intention of or having the effect of, restricting fair trading.

The Board of Stonewest Ltd will develop and implement procedures, proportionate to the risk involved and will communicate it at appropriate intervals to Company officers, employees, Clients and suppliers. It is not the intention of this policy to restrict the provision or receipt of minor benefits, up to £100.00, including hospitality with Clients, suppliers or others carried out for the purpose of public relations.

Benefits received, or offered for receipt, of over £100.00 in value must be advised to the Managing Director. Approval for any benefit or cost of hospitality of over £100.00 must be approved by the Managing Director before offer or implementation. Similarly, any concerns on bribery/corruption should be directed to the Managing Director.

Action will be taken against any party involved in bribery, fraud or malpractice; for employees any such act will be considered as gross misconduct which may result in dismissal. For outside parties, action may include terminating contracts.

Whistle blowing is encouraged by any person to prevent bribery, fraud or malpractice from occurring or to identify if it has occurred. Whistle blowing action will be regarded as a positive action and can be carried out without fear of recrimination or disciplinary action.

This policy will be reviewed every 12 months, or before if required by events, for continued suitability and effectiveness.



NICK WILSON  
Director  
1 March 2019