

Anti-Bribery and Corruption Policy

Lift Specialists Ltd is committed to maintaining the highest level of ethical standards at all times and ensuring that the Company's business is conducted in a socially responsible manner. The purpose of this policy is to ensure Lift Specialists Ltd compliance with all applicable anti-bribery and corruption regulations.

Understanding Bribery and Corruption

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal or a breach of trust. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. Bribes are not always financial. Gifts, hospitality and entertainment can be construed as bribes if they are used to influence an individual's decision.

Corruption is the dishonest or fraudulent use of entrusted power for personal gain; this may include, but is not limited to, bribery.

This policy covers:

- Excessive gifts, entertainment and hospitality.
- Facilitation payments used by businesses or individuals to secure or expedite the performance an action.
- Reciprocal agreements or any other form of 'quid pro quo', unless they are legitimate business arrangements which are properly documented and approved by management.
- Actions by third parties for which the firm may be held responsible. This includes agents, contractors and consultants, acting on the firm's behalf. Appropriate due diligence should be undertaken before a third party is engaged.
- Record keeping, as this can be exploited to conceal bribes or corrupt practices.

This policy is not designed to practices, such as normal hospitality, provided they are appropriate, proportionate and are properly recorded.

Policy Statement

It is Lift Specialists Ltd policy to conduct all of our business in an honest, transparent and ethical manner. There is a zero-tolerance approach to bribery and corruption in any form. We are committed to acting professionally, fairly and with integrity.

We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. However, we remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both at home and abroad.

Bribery and corruption are punishable for individuals by up to ten years' imprisonment and an unlimited fine. It would be greatly damaging to Lift Specialist Ltd reputation to be involved in any form of corruption or bribery, and as such we take our ethical and legal responsibilities seriously.

Employee Responsibility

In this policy, the term employee applies to all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary),

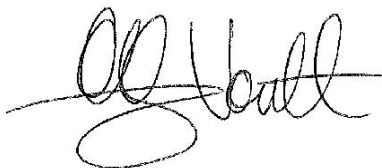
Document Ref: 0062 – Anti-Bribery & Corruption Policy Revision: 2 Issue Date: 28/11/16

consultants, contractors, trainees, homeworkers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with Lift Specialists Ltd. The prevention, detection and reporting of bribery and other forms of corruption is the responsibility of all those working for us or under our control. All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with other workers if they breach this policy.

How to Raise a Concern

All employees encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. Any queries as to what constitutes an act of bribery or corruption, or any concerns as to possible acts of bribery should be presented to the managing director.



Signed.....

Managing Director

Date 4.1.2021