



Anti-Bribery and Corruption, Business Integrity and Ethics Policy

Mission Statement

HRL is committed to conducting its business ethically as well as complying with all applicable laws.

Responsibility

The Managing Director, Julie Hamilton, is responsible for ensuring the policy is implemented. However, all employees have a responsibility in their area to ensure that the aims and objectives of the policy are met.

Legally

Bribery is illegal and penalties can be severe, including prison sentences and large financial penalties. Legislation in the UK (the Bribery Act 2010) not only makes paying or taking a bribe illegal but also holds UK companies liable for failing to prevent bribery by those working on its behalf. HRL will take report any breaches to the relevant authorities.

Recognising Bribery and Corruption

- A bribe could involve the direct or indirect promise, offer, authorization, or provision of anything of value.
- The offer or receipt of any kickback, loan, fee, commission, reward, or other advantage.
- The giving of contributions or donations designed or stipulated to influence the recipient to act in the giver's favour.
- The purpose of a bribe is often to obtain, retain or "facilitate" business.
- It does not matter whether the act of bribery is committed before or after the tendering of a contract or the completion of an administrative task.
- The party offering a bribe might be an employee or director.

Contracts

A level of due diligence appropriate to the situation must be undertaken prior to the retention or renewal of an agreement. If required by a risk assessment, certain provisions will be included in an Agent’s agreement regarding compliance with appropriate laws

Hospitality and Entertainment

Bona Fide hospitality and promotional, or other business expenditure which seeks to improve the image of HRL, better to present products and services, or establish cordial relations, is recognised as an established and important part of doing business. Hospitality, entertainment, or other business expenses for these purposes are permitted as long as they are reasonable and proportionate.

Giving and receiving Gifts

HRL employees may never seek or request gifts, or personal preferential treatment in any matter, from any person or organisation. HRL policy generally permits the giving and receiving of business gifts of ‘Nominal value’ that are customary business courtesies and are reasonable in value and frequency.



Signed

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Position Managing Director

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Date: 1st June 2025

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