

Hull Storage & Interiors Ltd does not offer, give, ask for or accept bribes. This applies to everyone who works for us or on our behalf, whoever they are dealing with.

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Policy owner	Approved by	Applies to	Status
James Smith	Susan Smith	Staff and suppliers	Current

1. Purpose and scope

The Bribery Act 2010 makes it a crime to offer, give, request or accept a bribe. A company also commits an offence if someone acting for it pays a bribe to win it business, unless it had adequate procedures in place to prevent that. This policy sets out ours, and follows the six principles in the Ministry of Justice guidance on the Act.

It applies to our directors and employees, and to the subcontractors, agents and suppliers who act for us. We sell to the NHS and other public bodies, whose own rules on gifts and hospitality are strict. We respect those rules as well as this policy. It is part of our staff induction, and the directors review it every year.

2. What a bribe is

A bribe is anything of value offered or given to persuade someone to act improperly, or to reward them for doing so. It does not have to be money. Gifts, hospitality, personal discounts, jobs and favours all count. It does not have to succeed, and it makes no difference who pays.

3. What we will not do

We will not:

- ❑ offer or give anything of value to win or keep business, or to gain an advantage we are not entitled to
- ❑ accept anything of value that is meant to influence how we buy, quote or award work
- ❑ make facilitation payments: small unofficial payments to speed up a routine action
- ❑ make political donations on behalf of the company
- ❑ disguise a payment through a third party, a donation or a false invoice
- ❑ penalise anyone for refusing to pay a bribe, or for raising a concern

4. Gifts and hospitality

Modest, occasional gifts and hospitality are a normal part of business, and this policy does not stop them. They must be given openly, in the company's name, and never while a tender or contract decision is pending.

Situation	What to do
Low-value branded items, or a working lunch	Acceptable. No approval is needed.
Anything worth more than £50, given or received	Ask a director first, and record it.
Cash or vouchers, or anything offered to a public official or during a tender	Never acceptable. Decline, and tell a director.

5. Suppliers and subcontractors

We are a distributor, and we use subcontractors to install what we sell. We expect everyone who supplies us, or acts on our behalf, to comply with the Bribery Act 2010. We choose who we work with on merit, and we pay only for goods and services that have properly been supplied. Our records must show what was paid, to whom and why.

6. Raising a concern

If you are offered a bribe, are asked for one, or suspect that this policy has been broken, tell a director as soon as you can, or another director if yours is involved. You will not be treated badly for raising a genuine concern, even a mistaken one.

7. Breaches

Bribery is a criminal offence, punishable by up to ten years in prison and an unlimited fine, and a convicted company can be excluded from public contracts. Anyone who breaches this policy may face disciplinary action, or the end of their contract with us.

Sign-off

Signed



Date

01/10/2026

Name

James Smith

Position

Director