

Anti-Bribery and Corruption Policy Statement

2022-2023

Introduction

Longworth is committed to operating a strict zero tolerance approach towards bribery and corruption in all forms, and we are committed to acting professional, fairly and with integrity, whether directly or indirectly through third parties.

We strongly encourage free and fair competition throughout our supply chain and other companies acting on behalf of or working with Longworth and as such we benefit from carrying out business in a transparent and ethical manner.

Longworth define bribery as when a person or business offers, promises or gives financial (or other) advantage to another person with the intention of persuading them to act in a way which benefits the individual or company offering the advantage. Corruption is classed as any form of illegal, dishonest or immoral behaviour, particularly by people in a position of power.

Purpose

The purpose of this policy is to demonstrate our understanding and application of legal and other obligations, in relation to bribery and corruption, in particular the Bribery Act 2010. Our legislation and obligations register identifies our compliance requirements and how we meet these.

Scope

This policy applies to all aspects of business carried out by Longworth. All persons acting on behalf of Longworth are expected to comply with the requirements of this policy and associated obligations. Where contractual requirements exceed our own policy Longworth will endeavour to meet this without prejudice.

Longworth commit to:

- Communicating our policy internally and externally to the business.
- Maintaining and reviewing business processes to limit scope for bribery and corruption.
- Encouraging employees to carry out business openly and honestly and to report any concerns.
- Investigating any allegations or suspected cases of attempted/actual bribery and/or corruption.
- Work with our supply chain to align standards on anti-bribery and corruption.
- Declaring anything that may be thought of as an attempted bribe or corruption attempt.
- Having a zero tolerance on our employees attempting to influence others or be influenced by others to gain from such transaction.
- Providing compulsory training for employees on anti-corruption and bribery.
- Taking appropriate action in relation to concerns raised.

Responsibilities

All employees are responsible for their own conduct in relation to bribery and corruption and have a duty to report any concerns to a company director.

The board of directors take bribery and corruption very seriously, as both a legal and ethical matter, and as such commit to informing authorities where necessary in order to facilitate legal investigation.

The company will cooperate with authorities on any cases brought to its attention.



Paul Smith
Managing Director

Date: 1st December 2022

Scheduled Review Date: 30th November 2023