

TRAD Hire & Sales Ltd POLICY

Anti-Bribery & Corruption Policy

REV	DATE	STATUS / DESCRIPTION OF CHANGES
00	01-Sept-22	First issue
01	01-Sept-23	General Review
02	01-Sept-24	Update for compliance with ISO 37001

DOCUMENT NO.	ABMF00
--------------	--------

STATEMENT

This TRAD UK Policy has been assembled to protect Company operations, customers, shareholders, employees and the general public from the adverse effect of Bribery and Corruption and reinforces our commitment to satisfy ISO 37001 anti-bribery management system requirements.

Note: this Policy is underpinned by ALTRAD group policies, including the ALTRAD Code of Conduct, also available on our website.

Relevant ALTRAD Group policies include:

- Anti-Bribery & Corruption Policy
- Business Integrity & Ethics Code
- Compliance PU Guidelines
- Conflict of Interests Policy
- Corruption Risk Mapping Methodology
- Counterparty due diligence policy
- Ethic and Integrity Framework
- Expectations of our Suppliers
- Finance Policy 3 expenses
- Finance procedure 2.0 Capex requests
- Gifts and Entertainment Policy
- Local Compliance Officer - Delegation of authority
- Local Compliance Officer - Scope of duties
- Local Ethics Committee Guide
- Modern slavery and human trafficking policy
- Whistleblowing Policy

TRAD takes a zero-tolerance approach to bribery and corruption and are committed to acting professionally, ethically and with integrity in all our business dealings and relationships wherever we operate; and implementing and enforcing effective systems to counter bribery and corruption.

Bribery & Corruption is an ever-present threat and can result in substantial costs to the company, loss of business and damage to our reputation.

TRAD will ensure that we enforce all control measures and work in compliance with the law including the UK Bribery Act 2010 & Sapin II, and reinforce our commitment to satisfy ISO 37001 anti-bribery management system requirements. This Policy applies to all TRAD employees, directors, contractors and consultants, who will be made aware during induction and in briefings of their duties and responsibilities.

It is not acceptable for you, or someone on your behalf, to:

- Give, promise to give, or offer, any payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given.
- Give or accept a gift or hospitality during any commercial negotiations or tender process, if this is intended or could be perceived as intended or likely to influence the outcome.

- Accept a payment, gift or hospitality from a Third Party that you know or suspect is offered with the expectation that it will provide a business advantage for them or anyone else in return;
- Accept hospitality from a Third Party that is unduly lavish or extravagant under the circumstances;
- Propose or accept to provide a personal service to an individual in order to obtain a business advantage from the legal person he represents;
- Threaten or retaliate against another individual who has refused to commit a Bribery offence or who has raised concerns under this Policy;
- Negotiate a personal kickback or commission with a Third Party in exchange for a business advantage;
- Agree to hire a person in exchange for the granting of a business advantage.

Any such incidents must be reported to the relevant line manager, who will escalate it where required to the Ethics Committee (which include the HR Director, Managing Director, and Ethics Officer) who will where required convene a meeting to discuss and decide on appropriate actions, and anyone "whistleblowing" will be protected, as it is in the best interests of the company to prevent any form of bribery or wrongdoing.

Note: You can also email the HR Director (who will inform the Ethics Committee): HR@trad.co.uk

All employees must- log gifts and hospitality on the GAN system for approval where required. Gifts are to be inexpensive (where practicable, to be TRAD diaries, pens and calendars).

Note: please speak to the Finance Director (LCO) for advice where required.

Similarly, directors/managers/supervisors must refuse all inappropriately costed gifts from subcontractors and when in doubt must personally speak to their LCO who will decide on appropriate action.

As a basic principle any transaction resulting from a business relationship designed to achieve personal gain to a member of staff or their family is expressly forbidden. Employees are forbidden to accept gifts from suppliers other than small promotional items with a nominal value such as (inexpensive) pens, diaries and calendars.

The following types of HOSPITALITY must not be accepted:

- Use of donor's property;
- Tickets for events or function at which the donor is not present;
- Any type of level of entertainment which is outside the bounds of accepted business hospitality;
- Extension of business trips for leisure purposes paid for by the host;
- Visits to any location which does not have a genuine business purpose. The only exceptions are modest hospitality such as business lunches which are viewed as a courtesy of a business relationship and which, at some point, where practical should be reciprocated;
- Employees must not under any circumstances allow themselves to be entered for any competition run, administered or in any way controlled by a supplier.

The following types of PAYMENT are strictly prohibited:

- Cash inducements;
- Payment of travel and accommodation expenses for employees or for their family members;
- Payment of any employee's normal business travel and accommodation expenses;
- Payments to subsidise private events or activities.

TRAD will ensure that all suppliers are made aware of this policy and the ALTRAD Group Policies, including the ALTRAD Code of Conduct (e.g., by email and including attaching links to our TRAD website) and that all employees are made aware of this policy (by memos and briefings). All suppliers will be required to acknowledge that they have read, understood, and will always comply with the policy where required.

Note: this Policy will be reviewed when ALTRAD update their policy, but this policy will not be revised and re-issued unless there are significant updates.

The supplier and any person, organisation or company working on their behalf will comply with this policy (and with the spirit of the policy). The supplier must inform the MD if the supplier, or any person, organisation or company acting on their behalf has any personal connection which may materially influence transactions. In the event of a failure to comply with the policy, TRAD will be entitled to terminate all contractual relationships with the supplier without payment or compensation and that in such circumstances all rights of TRAD will be reserved.

Everyone – including employees, directors, officers, consultants, contractors, agents, representatives, business partners, sponsors, interns, casual workers, seconded workers and agency workers – has a role to play in preventing, detecting and reporting Bribery and Corruption

You must:

- Carry out your duties in such a way as to prevent bribery and Corruption.
- Immediately report any suspicion of bribery/corruption to your line manager, or Managing Director/Director, who will report to the Ethics Committee.

The MD and Ethics Committee will ensure that:

- Every reported incident of dishonest behaviour will be investigated;
- The confidence of those reporting the incident or suspicion of fraud etc will be respected;
- Where appropriate, the investigation will be carried out either internally by Managers, appointed by the MD and Ethics Committee, having no operational responsibility within the business unit implicated, or externally by an appointed agency reporting to the MD and Ethics Committee;
- For serious breaches, or where an internal/external investigation is deemed inappropriate, then the police and/or other authorities will be contacted immediately.
- All instances of misconduct or serious misconduct will be dealt with in accordance with TRAD staff handbook and misconduct
- This policy provides a framework for setting, reviewing and achieving anti-bribery Objectives.

In all cases the MD, in consultation with the Ethics Committee, will take the decision as to whether the police or other authorities should be brought into the investigation.

Whistleblowing

We are committed to upholding all laws relevant to countering bribery and corruption, and complying with our parent company's Whistleblowing Policy.

At TRAD we,

- encourage TRAD employees and the related third parties (Whistleblower) to report suspected wrong-doing as soon as possible;
- reassure Whistleblowers that their concerns will be taken seriously and investigated, and that their confidentiality will be respected;
- provide Whistleblowers with guidance as to how to raise their concerns; and,
- re-assure Whistleblowers that they can raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

Whistleblowing is the disclosure to TRAD of information which relates to suspected dangers at work or wrongdoing. These may include:

- breach of, default of or behaviours contrary to, this policy and the ALTRAD Group's Business Integrity & Ethics Code, with respect to bribery or corruption and/or any other internal ALTRAD or TRAD policy (anticorruption policies, conflicts of interest policy, etc.);
- dangers to the health and safety of TRAD employees and others;
- financial fraud or mismanagement;
- criminal activity or offences;
- a clear and serious violation of applicable laws or regulations;
- a clear and serious infringement of laws of any international organization that has been subsequently adopted locally in the applicable country;
- a serious threat or the causing of serious damage to the public interest of which the Whistleblower had personal knowledge;
- damage to the environment;
- conduct likely to damage ALTRAD and TRAD's reputation;
- unauthorised disclosure of confidential information; and/or,
- the deliberate concealment of any of the above matters.

The concern shall be raised in a disinterested manner and in good faith, i.e., without malicious intent and without malice, in the general interest without seeking the satisfaction of any particular interest, financial or otherwise, with a genuine concern about dangers at work or any wrongdoing (as set out above).

In many cases it will be possible to raise concerns with the line manager (in person or in writing). Where this is not possible, then they should inform the Ethics Committee by speaking to their Managing Director or by:

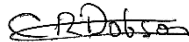
- emailing the HR Director (who will inform the Ethics Committee): HR@trad.co.uk
- Use ALTRAD Compliance hotline 08002081078 / compliance@altrad.com
- Reporting the concern on the Group GAN Platform [GAN Compliance Management System \(gan-compliance.com\)](https://gan-compliance.com)

Declaration

TRAD is fully committed to ensuring compliance both with the letter and spirit of the principles of this Policy. For that reason, Mr. Dobson has been appointed with the responsibility and authority to oversee and drive compliance. TRAD are committed to continual improvement of the Anti-Bribery Management System and this Policy will be reviewed annually and the Policy will be disseminated throughout the company and supply chain as required.

For and on behalf of TRAD:¹

Colin Dobson,
TRAD UK,
Managing Director



Dated: as front page

¹ Please note that TRAD UK is a business name of TRAD Hire & Sales Limited; Registered Office: Albion Road, Dartford, Kent, DA1 5PZ. Registered in England No. 3491083.