

Pirtek Europe Holdings, Pirtek Europe & Pirtek UK

1 UK Bribery Act 2010 Commencing from 1st July 2011 – Policy Statement

1.1 Pirtek Europe Holdings on behalf of ; Pirtek UK and Pirtek Europe their subsidiaries (in Combination Pirtek), and their associates have acknowledged their obligation to conform to all aspects of the UK Bribery Act 2010.

As such, all employees and associates will be advised as to their responsibilities under the Act. All employees and associates shall follow all procedures as stated in the detailed policy document that shall be monitored, tested and reviewed on a continuing basis.

1.2 The Policy.

No Pirtek company, employee or associate will in any way offer or promise to give a bribe as an inducement to secure new or repeat business on favourable terms by or providing overly generous gifts, excessive corporate hospitality and corporate entertainment or other commission or incentive payments.

1.3 The Directors of Pirtek Europe Holdings Ltd are committed to ensure that the bribery act policy is adopted and acknowledged by all employees and associates. All employees and associates shall be required to sign a copy of the bribery act policy confirming they have read it and agree to abide by the policy contents. A signed copy of the bribery act policy shall be displayed on each Pirtek site.

The act creates four new offences:

- 1.4**
- a) Bribing another person, i.e offering or promising or giving a bribe as an inducement to secure new or repeat business on favourable terms by or providing overly generous gifts, excessive corporate hospitality and corporate entertainment or other commission or incentive payments.
 - b) Being bribed i.e requesting, agreeing or receiving or accepting a bribe as an inducement to accept new or repeat business on favourable terms or by accepting overly generous gifts, excessive corporate hospitality and corporate entertainment or other commission or incentive payments
 - c) Bribing a foreign official
 - d) Failing to prevent bribery or have adequate procedures in place to prevent bribery

Following a review of the act and offences it is clear that offences a) b) and d) are those most applicable to Pirtek and its UK and European subsidiaries and associates.

1.5 The bribery act policy shall be brought to the attention of all Employees, Customers, contractors, and suppliers and Pirtek shall ensure that the contents of the policy are clear and audited.

1.6 The Directors of Pirtek recognise and accept their responsibilities under the bribery Act 2010, and its regulations that affects the business, and in order to comply with the regulations shall provide the necessary communication, information, instruction, training, and supervision to ensure the Bribery Act 2010 is complied with by all employees.



Pirtek Europe Holdings, Pirtek Europe & Pirtek UK

Signed by Director

Chris Stuckey

Date:

16th June 2018

A signed copy is to be retained in the General Office and a copy displayed in the trade counter.

Next review date: June 2019

Sign off section for employees and associates:

I have read and understood the policy and have been given a copy of the procedure.

Name	Date	Signature