

Anti-Bribery and Corruption Policy

Date: 18th July 2025

Review Date: Annual from 1st January.

1. Policy Statement

AOne Tools & Fixings Ltd is committed to conducting its business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly, and with integrity in all our business dealings and relationships.

We will uphold all laws relevant to countering bribery and corruption in the UK, including the **Bribery Act 2010**.

2. Who is Covered by the Policy

This policy applies to all individuals working for or on behalf of AOne Tools & Fixings Ltd, including:

- Employees (permanent, temporary, or contract)
- Directors and officers
- Suppliers, contractors, and consultants
- Business partners and agents

3. What is Bribery?

Bribery is offering, promising, giving, accepting, or seeking a financial or other advantage to induce or reward improper performance of a function or activity. Examples include:

- Offering money to secure a contract
- Accepting gifts in return for preferential treatment
- Making facilitation payments to speed up routine services

4. Our Rules and Expectations

- **Do not offer or accept bribes:** This includes gifts, hospitality, or anything of value intended to influence a business decision.
- **Gifts and Hospitality:** Must be reasonable, proportionate, and declared. Lavish or frequent gifts/hospitality are not permitted.
- **Facilitation Payments:** These are strictly prohibited.
- **Donations and Sponsorships:** Must not be used as a cover for bribery. Any charitable donation must be approved by management.
- **Third Parties:** You must ensure third parties acting on our behalf also comply with this policy.

5. Risk Areas

We recognise the following areas may pose a higher risk:

- Overseas transactions or operations
- Public sector contracts or officials
- Agents, intermediaries, or consultants acting on our behalf
- Procurement and tendering processes

6. Reporting Concerns

All employees and business partners are encouraged to report concerns about potential bribery or corruption. Reports can be made in confidence to:

- Managing Director, shaun@aonetools.co.uk

There will be no retaliation against anyone who raises a genuine concern in good faith.

7. Responsibilities

- **Senior Management:** Overall responsibility for policy implementation and review.
- **Managers:** Must ensure their teams understand and follow this policy.
- **Employees:** Must read, understand, and comply with this policy.

8. Training and Communication

All relevant employees will receive periodic training on anti-bribery and corruption practices. This policy is available to all staff and key stakeholders and forms part of our induction process.

9. Breaches of the Policy

Breaches of this policy will be treated as a serious disciplinary matter and may result in termination of employment or contracts. Where appropriate, breaches may be reported to law enforcement.

10. Monitoring and Review

This policy will be reviewed annually and updated to reflect any changes in legislation or business operations.

Signed:



Shaun Bairstow

Managing Director

AOne Tools & Fixings Ltd

Date: 18/07/2025