

# Bribery and Corruption Policy



Metaltech Precision Ltd (MTP) is committed to carrying out its business activities in an honest and ethical manner and for complying with the Bribery Act 2010. Therefore, it is MTP's policy that in seeking to secure business that no secondary favours pass between prospective customers and the company.

The Bribery Act holds businesses and institutions liable for failing to prevent bribery carried out on their behalf, irrespective of whether the bribe takes place in the UK or overseas. Sanctions for these offences include up to 10 years' imprisonment for the individuals responsible. In addition, if MTP is found to have connived in or consented to acts of corruption undertaken in its name, the penalties include personal liability and an unlimited fine as well as significant damage to reputation.

This policy outlines how MTP is observing and upholding the it's position on bribery and enforcing effective processes to counter it.

Acts of Bribery or corruption are designed to influence an individual in the performance of their duty and incline them to act in a way that a reasonable person would consider to be dishonest in the circumstances.

- **Bribery** is the offer or receipt of any gift, loan, payment, reward to other advantage to or from any person as an encouragement to do something which is dishonest, illegal or a breach of trust in the Conduct of the Company's business.
- **Corruption** is the misuse of entrusted power for private gain.

MTP does not tolerate any form of bribery or corruption. The company prohibits the offering, giving solicitation or the acceptance of any bribe or corrupt inducement, whether in cash or in any other form:

- to and from any person or company wherever located whether a public official or public body; or
- by a director, employee, agent, consultant, supplier acting on our behalf; or
- in order to gain any commercial, contractual or regulatory advantage for the Company; or
- in order to gain personal advantage, monetary or otherwise, for the individual or anyone connected to the individual.

MTP will uphold laws relevant to countering bribery and corruption in all jurisdictions in which it operates.

Anyone acting on our behalf is encouraged to raise concerns about malpractice at the earliest possible stage with the Managing Director. They will receive MTP's full support even if it may result in the loss of business.

To eliminate risk of bribery and corruption, all those acting on behalf of MTP must act in accordance with the following:

- behave honestly, be trustworthy and set a good example
- use the resources of the company in the best interests of MTP
- make a clear distinction between the interests of MTP and your private interests to avoid any conflict
- ensure that any community support, sponsorship and charitable donations do not constitute bribery
- raise any issues regarding anti bribery and corruption laws and MTP's policy
- do not offer or accept bribes
- do not offer or receive money to or from any public officials, customers, consultants and suppliers in order to gain an improper advantage

If anyone acting on our behalf is uncertain as to whether their actions will comply with this policy, they must seek guidance from the Managing Director.

## Awareness

Employees are made aware of this policy during their induction and via the applicable management system procedures which can be accessed via the shared network.

Employees and others acting for MTP are made aware that they can raise concerns regarding bribery and corruption within our business or supply chain, without fear of reprisals.

## Review and Approval

This policy is approved by the Managing Director will be reviewed annually and updated as necessary.

Stephen Hill  
Managing Director  
18/2/2021