



(Incorporating Protech Component Consultants)

ANTI BRIBERY POLICY

Contents

Introduction 3

Policy 3

 Company Responsibility 3

 Employee Responsibility: 3

 Non Compliance 4

 Implementation of the Policy 4

 Monitoring Policy 5

 Reviewing Policy 5

 Policy Amendments 5

 Additional Information 5

Introduction

The Company is committed to implementing and enforcing effective systems to counter bribery. Therefore, it is the Company's policy to conduct all aspects of its business in an honest and ethical manner at all times.

Policy

The aim of this policy is to help Hub electronics act in accordance with the Bribery Act 2010, maintain the highest possible standards of business practice, and advise individuals of the Company's 'zero-tolerance' to bribery.

This policy applies to all permanent and fixed-term staff employed by the Company, and any contractors, consultants or other persons acting under or on behalf of Hub Electronics.

The Company will not:

- Make or receive payment contributions of any kind with the purpose of gaining any commercial advantage.
- Provide gifts or hospitality with the intention of persuading anyone to act improperly, or to influence a public official in the performance of their duties.
- Make, or accept, financial reward of any kind.

Exceptions:

- For clarity, the following exception (subject to company rules) shall allow the giving or receiving of small low value occasion gifts or appropriate company advertising material that may be allowable to 'the Customer' subject to and respecting the companies own rules and exceptions.

Company Responsibility

The Company will:

- Keep appropriate internal records that will evidence the business reason for making any payments to third parties.
- Encourage employees to raise concerns about any issue or suspicion of malpractice at the earliest possible point.
- See that anyone raising a concern about bribery will not suffer any detriment as a result, even if they turn out to be mistaken.

Employee Responsibility:

Employees must not:

- Accept any financial or other reward from any person in return for providing some favour.
- Request a financial or other reward from any person in return for providing some favour.
- Offer any financial or other reward from any person in return for providing some favour.

Non Compliance

All employees have a role to play in enforcing the policy and are required to deal with any observed or reported breaches. Should employees feel apprehensive about their own safety in regard to addressing any breach, they should seek senior management support.

Any member of staff refusing to observe the policy will be liable to disciplinary action in accordance with the Company's Disciplinary Policy up to and including dismissal.

Implementation of the Policy

Overall responsibility for policy implementation and review rests with the Company senior management. However, all employees are required to adhere to and support the implementation of the policy. The Company will inform all existing employees about this policy and their role in the implementation of the policy. They will also give all new employees notice of the policy on induction to the Company.

This policy will be implemented through the development and maintenance of procedures for appraisals and one-to-one meetings, using template forms, and guidance given to both managers and employees on the process.

This Policy was approved & authorised by:

Name: P Latter / K Holmes

Position: Director

Date: October 2016

Review Status	Last rev	This rev
2	Oct - 2015	Oct - 2016

Monitoring Policy

The policy will be monitored on an on-going basis, monitoring of the policy is essential to assess how effective the Company has been.

Reviewing Policy

This policy will be reviewed and, if necessary, revised in the light of legislative or codes of practice and organisational changes. Improvements will be made by the management byway of law changes and/or Customer policy and the use of established reviews.

Policy review date: Annually

Policy Amendments

Should any amendments, revisions, or updates be made to this policy it is the responsibility of the senior management to see that all relevant employees and interested parties receive written notice and/or training. The management review meeting shall consider on an annual basis (or sooner if required) and additions or amendments to this document. This document is held and reviewed within the quality management system.

Additional Information

If you require any additional information or clarification regarding this policy, please contact the undersigned. To the extent that the requirements of this policy reflect statutory provisions, they will alter automatically when and if those requirements are changed.