

13. If hospitality is offered by any Company this should be approved in advance by a Director who should review the hospitality in light of the UK Bribery Act 2010. Hospitality is not prohibited by the Act but should be considered in the light of it.
14. Facilitation payments, payments to induce officials to perform routine functions they are otherwise obligated to perform, are bribery under the Act.
15. All employees have a responsibility to help prevent and report instances of not only bribery, but also of any other suspicious nature or wrong doing. Any reportable incident should be reported to the employee's line Manager or Director.
16. Any act of bribery and/or corruption will be considered to be Gross Misconduct which is the most serious of breaches of conduct and could warrant dismissal.
17. The policy will be monitored and updated as necessary and Senior Managers should ensure that their employees have a complete understanding of The Bribery Policy.

BRIBERY – is the offer or receipt of any gift, loan, payment, reward or other advantage to or from any persons as an encouragement to do something which is dishonest illegal or a breach of trust in the conduct of the company business.

CORRUPTION – is the abuse of entrusted power for private gain.

The Board of Directors do not tolerate Bribery in any form.



Ian Leith
Chairman
Leiths (Scotland) Ltd 01/10/18

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