



Engineering & Project Management

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ANTI-BRIBERY AND CORRUPTION POLICY

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Approved By:	MD
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Prepared For:

**HMF Engineering and Project Management
Consultants Ltd.'s Employees and
Contractors**

Table of Contents

1.	Introduction	3
2.	What is Bribery and Corruption	3
3.	Our Commitment	3
4.	Prohibited Activities	3
5.	Gifts and Hospitality.....	3
6.	Facilitation Payments	3
7.	Due Diligence and Third-Party Relationships	4
8.	Reporting Procedures.....	4
9.	Training and Awareness	4
10.	Consequences	4
11.	Policy Review.....	4

1. Introduction

HMF is committed to conducting business ethically and with integrity. This Anti-Bribery and Corruption Policy (the "Policy") outlines our zero-tolerance approach to bribery and corruption and applies to all employees, agents, and contractors working on our behalf.

2. What is Bribery and Corruption

Bribery: Offering, promising, giving, or asking for an undue advantage (money, gift, hospitality, etc.) to influence a decision or action.

Corruption: The abuse of entrusted power for personal gain.

3. Our Commitment

We are committed to:

- Complying with all applicable anti-bribery and corruption laws and regulations.
- Conducting business with honesty and integrity.
- Creating a culture of intolerance towards bribery and corruption.
- Implementing and enforcing effective procedures to prevent bribery and corruption.

4. Prohibited Activities

This Policy prohibits the following activities:

- Offering, promising, giving, or authorizing the offering, promising, or giving of any undue advantage to any person (including government officials) to:
 - Obtain or retain business.
 - Improperly influence a decision.
 - Gain any other unauthorized advantage.
- Accepting or soliciting any undue advantage from any person.
- Engaging in any activity that could create a conflict of interest.
- Failing to prevent bribery by a person associated with HMF.

5. Gifts and Hospitality

- Offering or accepting gifts or hospitality must be reasonable and proportionate to the business relationship.
- Cash gifts or cash equivalents are strictly prohibited.
- Lavish or excessive entertainment is not permitted.
- Prior approval may be required for offering or accepting gifts or hospitality exceeding a set value.

6. Facilitation Payments

Facilitation payments (small payments to expedite routine government actions) are generally prohibited. Exceptions may be allowed in limited circumstances, with prior management approval and strict record-keeping.

7. Due Diligence and Third-Party Relationships

- Prior to entering any business relationship with third parties, including suppliers, agents, distributors, and contractors, thorough due diligence must be conducted to assess their integrity, reputation, and compliance with anti-bribery and corruption laws.
- Contracts and agreements with third parties must include anti-bribery and corruption clauses requiring adherence to this policy.

8. Reporting Procedures

- Any employee who becomes aware of or suspects a violation of this policy must report it immediately to their supervisor, the Compliance Officer, or through the company's confidential reporting mechanism.
- HMF prohibits retaliation against employees who report suspected violations of this policy in good faith.
- All employees are required to cooperate fully with internal investigations into alleged violations of this policy.

9. Training and Awareness

We will provide training to all employees on this Policy and their anti-bribery and corruption obligations.

10. Consequences

Violations of this Policy will be subject to disciplinary action, up to and including termination of employment or contractual relationship and may also lead to civil or criminal penalties for individuals and the company. The Company may also be subject to legal penalties.

11. Policy Review

This policy will be reviewed periodically to ensure its effectiveness and relevance to the company's operations. Any updates or amendments will be communicated to all relevant stakeholders.