



Altius Lifts Ltd Anti-Bribery and Corruption Policy

Policy Statement

Altius Lifts Ltd is committed to conducting its business with integrity, honesty, and transparency. We have a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and ethically in all our business dealings and relationships. This policy applies to all employees, contractors, consultants and any other parties working on behalf of Altius Lifts Ltd.

Objectives

1. To comply with the Bribery Act 2010 and all other relevant legislation in the UK.
2. To prevent, detect and address bribery and corruption in all forms.
3. To promote a culture of integrity and transparency within the organisation.
4. To provide guidance and training to employees and associated persons on anti-bribery and corruption practices.
5. To ensure that all business activities are conducted in a manner that avoids any appearance of impropriety.

Commitments

1. **Prohibition of Bribery and Corruption**
 - Prohibit offering, giving, soliciting or accepting any bribe or corrupt payment in any form.
 - Ensure that no employee or associated person engages in any activity that could be perceived as corrupt or unethical.
2. **Compliance with Laws**
 - Comply with the Bribery Act 2010 and all other relevant UK legislation and regulations.
 - Ensure that all business dealings are conducted in accordance with applicable legal and regulatory requirements.
3. **Gifts and Hospitality**
 - Allow the giving and receiving of appropriate gifts and hospitality in the ordinary course of business, provided they are reasonable, proportionate and transparent.
 - Prohibit gifts or hospitality that could influence, or appear to influence, business decisions or secure an improper advantage.
4. **Third Parties**
 - Conduct appropriate due diligence on third parties, including suppliers, contractors and business partners, to ensure their compliance with anti-bribery and corruption laws.
 - Include anti-bribery and corruption clauses in contracts with third parties.
5. **Training and Awareness**
 - Provide regular training and resources to employees and associated persons on anti-bribery and corruption policies and procedures.
 - Promote awareness of the risks of bribery and corruption and the importance of compliance with this policy.



6. Reporting and Whistleblowing

- Encourage employees and associated persons to report any suspected bribery or corruption activities without fear of retaliation.
- Provide clear reporting channels and ensure that all reports are investigated promptly and thoroughly.

7. Monitoring and Review

- Regularly monitor and review the effectiveness of this policy, our anti-bribery and corruption procedures.
- Take appropriate corrective actions to address any identified weaknesses or breaches.

Implementation

1. Management Responsibility

- Senior management is responsible for the implementation and enforcement of this policy.
- Allocate appropriate resources to support anti-bribery and corruption initiatives and compliance.

2. Employee Responsibility

- Employees are expected to adhere to this policy and act with integrity and honesty in all business dealings.
- Report any concerns or suspicions of bribery or corruption to their supervisor or the designated compliance officer.

3. Compliance Officer

- A designated compliance officer will oversee the implementation of this policy, provide guidance and address any concerns or reports related to bribery and corruption.

Review and Continuous Improvement

Altius Lifts Ltd is committed to the continuous improvement of our anti-bribery and corruption measures. This policy will be reviewed annually, or more frequently, if necessary, to ensure its effectiveness and relevance. Feedback from employees and other stakeholders will be actively sought and considered in the review process.

Approval

This anti-bribery and corruption policy is endorsed by the senior management of Altius Lifts Ltd and is effective from 10/03/2026.

Paula Bettridge

Paula Bettridge
Managing Director
Altius Lifts Ltd
10/03/2026