



BRIBERY AND CORRUPTION POLICY

ALTIUS LIFTS LTD are fully aware that bribery and corruption is a criminal offence and that our organisation could be liable if a senior person in our company commits a bribery offence.

We could also be liable if someone who performs services for us (employees, agents etc.) pays a bribe specifically to get business, keep business, or gain a business advantage for our company. Therefore, we never pay bribes or offer improper inducements to anyone for any purpose. This includes the making of Facilitation Payments, Political Contributions, Charitable Donations or Offering Sponsorships where there will be a Business or Financial advantaged gained as a result. We also never use third parties to channel bribes to others or otherwise encourage bribery.

ALTIUS LIFTS LTD do not accept any bribes or improper inducements offered to our company. This includes the use of Gifts, Hospitality or Travel Expenses.

In certain limited circumstances, and in connection with our duties, it may be appropriate for our employees to offer or receive gifts of low value or small tokens of gratitude, such as merchandise/branded items which have been designed for the purpose of being given away such as pens etc.

ALTIUS LIFTS LTD have a zero-tolerance policy towards bribery and it is our objective to prevent, deter and detect bribery.

To comply with the Bribery Act it is our objective to have adequate procedures in place to prevent bribery, these procedures will be proportionate to the size of the business and the risk of bribery. We also review our organisations processes against the Bribery Act 2010.

ALTIUS LIFTS LTD give top level commitment to delivering this policy which means the people in the best position can ensure we conduct our business without bribery and can be active in making sure that employee's and key people we do business with understand our policy and zero tolerance of bribery.

An important part of our policy is risk assessment. We have thought about the bribery risks we may face and researched the markets we operate in and companies we deal with. This includes simple things such as investigating a country's bribery or corruption levels before doing business there.

Some of our existing procedures and controls relating to company expenditure, accounting and commercial contracts also provide some protection against bribery.

We also carry out due diligence when taking people on and do appropriate checks on people who will be representing us.

All potential acts of Bribery, Corruption or anti-competitive behaviour must be reported to the Executive Responsible for Bribery and Corruption and will be thoroughly investigated.

It is vital that we communicate our policies and procedures to employees and others, so we enhance awareness and deter bribery by making it clear how we do business. This is usually done either through internal training or verbal instruction.

Paula Bettridge

Paula Bettridge
Managing Director
Altius Lifts Ltd
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