



Anti-Bribery and Corruption Policy

Anti-Bribery and Corruption Policy

Spitfire has a strict zero tolerance policy towards bribery and corruption. This policy sets out the standards of behaviour we expect.

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Introduction

The trust that Spitfire enjoys from our customers is one of our key assets and all employees are expected to work to ensure we do everything in our power to protect this asset. One of the ways we do this is through strict compliance with all laws and regulations.

Even before the introduction of the Bribery Act 2010 Spitfire has regularly reviewed its business practices. This is done not only to comply with the laws but also to protect our reputation and to uphold our commitment to carrying out business fairly, honestly and openly, in accordance with the highest ethical standards.

We have a strict zero tolerance policy towards bribery and corruption.

The Policy

Spitfire has a strict zero tolerance policy towards bribery and corruption. It is our policy to comply with the UK Bribery Act 2010

Therefore:

- Individuals working for Spitfire must never request or accept a bribe
- They must never offer, promise or give a bribe
- No individual will suffer, demotion, penalty or other adverse consequences for refusing to pay or receive bribes, even if the refusal may result in the company losing business

Who must Comply?

This policy applies to anyone who is employed by, or who performs services for, or on behalf of Spitfire.

What are bribery and corruption?

Bribery is promising, offering, giving, requesting or accepting any advantage to encourage or reward improper behaviour.

- An advantage can be any kind of benefit or anything of value, or perceived value to the person being offered the bribe – it does not have to involve money.
- Improper behaviour is behaviour which is illegal, dishonest or a breach of duty.

The bribe can be made direct or through a third person. It is still an offence to make a bribe, even if it is turned down or fails to have the intended effect.

Corruption is when you abuse your position with Spitfire, or someone else abuses the power or position associated with their role, for personal benefit.

How do you comply?

Everyone must follow standards of behaviour that minimise the risk of bribery. All dealings with customers and suppliers must be open, transparent and conducted appropriately, following Spitfire's business processes. This will ensure that no bribery or corruption takes place and it will avoid any appearance or suggestion that either Spitfire or you as an employee of Spitfire have behaved improperly.

You must:

Comply with this policy

Keep proper, accurate and complete records

Report any concerns immediately to the Joint Managing Directors.

You must not:

Promise, offer or give a bribe in any form

Request or accept a bribe

Allow a private interest to influence your work for Spitfire or fail to disclose a connection to a person or business Spitfire is doing business with.

Gifts and Hospitality

From time to time employees may be invited to a hospitality event. All such invitation should be reported to your manager and permission given before they are accepted.

If you receive or are offered gifts from suppliers or clients you should inform your Manager and they will decide if this can be accepted. If the gift is accepted, it will normally be placed in a "Company pool" which will be distributed by the HR Department.

The key question to ask yourself is 'Do I expect the business relationship to be improperly influenced as a result of the gift or hospitality?'

Reporting concerns

You must make your manager aware of any concerns and report them directly to the Joint Managing Directors.