

Sherrington Lifting Services Limited

Anti Bribery Act Policy - 2026

**Our Office
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Widnes
WA8 0GY**

ANTI BRIBERY ACT POLICY

Policy Statement

1. The Company (Sherrington Lifting Services Ltd) is committed to preventing, detecting, and reporting of any corruption of bribery activity.
2. The Company will manage this by:
 - Defining, setting and maintaining effective control procedures to identify and deter bribery within the Company.

We do not give or accept improper payments or gifts in order to conduct business anywhere in the world. We agree the terms of supplier payments at the start of business and pay in accordance with our contractual obligations.

You should not get involved in any business transactions that could result in personal benefit. You should not use your position as an Sherrington Lifting Services Ltd ., employee to get discounts from contractors/suppliers unless they are corporate agreed discounts notified and made available to all employees, or do personal business, unless expressly authorised by management.

Bribery, Gifts and Entertainment

You may not offer, give or receive bribes, any payments including facilitation payments, gratuities or gifts, directly or through a supplier, third party or agent, in order to obtain, retain or conduct business in any jurisdiction in which we operate. Do not allow suppliers to pay travel or accommodation expenses for you. Refuse entertainment unless the supplier is present, and it is in the bounds of accepted business hospitality. Always seek guidance and approval before accepting or giving a gift or entertainment.

1. Bribing another person;
2. Being bribed;
3. Bribing a foreign public official; and
4. Corporate offence of failing to prevent bribery.

1. Introduction

The Bribery Act which has recently been enacted represents the biggest change in UK laws in this area of business for many generations.

There are a new set of risks to navigate with the introduction of the legislation. The Act introduces a new crime of “failure to prevent” bribery, which means that companies unable to demonstrate that they have implemented “adequate procedures” to prevent corrupt practices within their ranks, or by third parties on their behalf, could be exposed to unlimited fines as well as other collateral consequences.

Sherrington Lifting Services Ltd . values its reputation for ethical behavior. It recognises that over and above the commission of any crime, any involvement in bribery will also reflect adversely on its image and reputation.

The purpose of this Policy Statement is to set out for senior members and employees of the Company the aim of limiting Sherrington Lifting Services Ltd ., exposure to bribery by:

- Setting out a clear anti-bribery policy.
- Training all employees and senior members so that they can recognise and avoid the use of bribery by themselves and others.
- Encouraging its employees to be vigilant and to report any suspicions of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately.
- Rigorously investigating instances of alleged bribery and assisting police and other appropriate authorities in any resultant prosecution.
- Taking firm and vigorous action against any individual(s) involved in bribery.

2. Scope

This Policy Statement applies to Company Directors and all employees who work for the Company

The Company prohibits.

The offering, the giving, the solicitation or the acceptance of any bribe, whether cash or other inducement

To or from

Any person or company, wherever they are situated and whether they are a public official or body or private person or company

By

- Any individual employee, Director, agent or other person or body action on the Company's behalf

In order to

- Gain any commercial, contractual or regulatory advantage for the Company in a way which is unethical

Or in order to

- Gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.

3. Further Clarification

The Company recognises the areas in which it does business and what is normal and acceptable in one place may not be in another. This policy statement prohibits any inducement which results in a personal gain or advantage to the recipient or any person or body associated with them, and which is intended to influence them to take action which may not be solely in the interests of the Company or of the person or body employing them or whom they represent.

This policy is not meant to prohibit the following practices providing they are.

- Customary in a market, are proportionate and are properly recorded:
- Normal and appropriate hospitality.
- The giving of a ceremonial gift on a festival or another special time.
- The use of any recognized fast-track process which is available to all on payment of a fee.
- The offer of resources to assist the person or body to make the decision more efficiently if they are supplied for that purpose only.

Inevitably, decisions as to what is acceptable may not always be easy. If anyone is in doubt as to whether a potential act constitutes bribery, the matter should be referred to Jon Sherrington Director

4. Employee and Senior Management Responsibility

The prevention, detection and reporting of bribery is the responsibility of all employees and Directors throughout the Company. Suitable channels of communication by which employees and others can report confidentially any suspicion of bribery will be maintained by the Whistleblowing.

5. Related Strategies and Policies

The following other strategies and policies have been developed to.

- Demonstrate to all that the Company will not tolerate any party who it either employs or works with entering fraudulent or corrupt acts that would damage their reputation of financial standing.
- Anti-Fraud and Corruption policy
- Whistleblowing

The Six Principles

The Government considers that procedures put in place by an organisation wishing to prevent bribery being committed on their behalf should be informed by six principles. Commentary and guidance on what procedures the application of the principles may produce accompanies each principle.

These principles are not prescriptive. They are intended to be flexible and outcome focused, allowing for the huge variety of circumstances that commercial organisations find themselves in. Bribery prevention procedures should be proportionate to risk.

I. Proportionate Procedures-The Company's procedures are there to prevent bribery by persons associated with it and are proportionate to the bribery risks it faces and to the nature, scale and complexity of the Company's activities. They are also clear, practical, accessible, effectively implemented and enforced.

II. Top-Level Commitment-the top-level management of a company, be it a board of directors, the owners or any other equivalent body or person must be committed to preventing bribery by persons associated with it. They foster a culture within the Company in which bribery is never acceptable.

III. Risk Assessment- the Company will assess the nature and extent of its exposure to potential external and internal risks of bribery on its behalf by persons associated with it. The assessment is periodic, informed and documented.

IV. Due Diligence - The Company will apply due diligence procedures, taking a proportionate and risk-based approach, in respect of persons who perform or will perform services for or on behalf of the Company, in order to mitigate identified bribery risks.

V. Communication (including training) - The Company will seek to ensure that its anti-bribery and anti-corruption (Fraud) policies and procedures are embedded and understood throughout the organisation through internal and external communication, including training, that is proportionate to the risks it faces.

VI. Monitoring and Review - The Company will monitor and review its procedures designed to prevent bribery by persons associated with it and makes improvements where necessary.

Signed - Johnathan Sherrington - Director

