



ANTI-BRIBERY POLICY



DOCUMENT CONTROL PAGE

COMPANY DETAILS

Company Name: Lockrose Limited
Company Number: 16101443
Company Address: The Clock House, Western Court, Bishops Sutton, Alresford, SO24 0AA

DOCUMENT CONTROL

Report Date: 26th November 2024
Reporting Period: November 2024 – November 2025
Next Review Date: November 2025
Classification: Public

Document No.	Version	Date of Issue	Author	Approved by	Review Date
LOCK-ANTBRI-POL-0001	1	26/11/2024	Jamie Mendoza	Sam Evans	-



ANTI-BRIBERY POLICY

1. Purpose

Lockrose Limited (“we,” “our,” or “the Company”) is committed to conducting business with honesty, integrity, and transparency. This policy outlines the Company’s stance on bribery and corruption, setting clear standards to prevent bribery in all forms in compliance with the Bribery Act 2010 and other relevant laws.

2. Scope

This policy applies to all employees, contractors, consultants, agents, and any other third parties acting on behalf of Lockrose. It also covers all business dealings and transactions carried out by or on behalf of the Company worldwide.

3. Policy Statement

Lockrose has a zero-tolerance approach to bribery and corruption. No employee or associated person shall:

- Offer, promise, give, request, or accept a bribe, whether directly or indirectly;
- Use facilitation payments or kickbacks;
- Engage in any activity that may lead to or suggest bribery or corruption.

The Company commits to:

- Complying fully with all applicable anti-bribery laws and regulations;
- Promoting an ethical culture of openness and accountability;
- Ensuring transparent and fair business practices at all times.

4. Definitions

4.1 Bribery

The offering, giving, receiving, or soliciting of something of value to influence a decision or obtain an unfair advantage.

4.2 Facilitation Payments

Small unofficial payments made to secure or expedite a routine government action.

4.3 Kickbacks

Payments made in return for a business favor or advantage.



5. Responsibilities

5.1 Management Responsibilities

Managers are responsible for:

- Promoting compliance with this policy and demonstrating ethical leadership;
- Ensuring teams understand the risks and reporting mechanisms related to bribery;
- Investigating any allegations of bribery promptly and fairly.

5.2 Employee and Contractor Responsibilities

All individuals must:

- Avoid any activities that could be perceived as bribery;
- Report any suspicions or knowledge of bribery or corrupt practices through the appropriate channels;
- Participate in anti-bribery training and adhere strictly to this policy.

6. Gifts, Hospitality, and Expenses

Lockrose permits reasonable and proportionate gifts or hospitality that are lawful and transparent. However, employees must not accept or offer gifts or hospitality if it could influence business decisions or be perceived as a bribe. All gifts and hospitality must be recorded and approved in accordance with the Company's procedures.

7. Third Parties

The Company expects all contractors, suppliers, agents, and partners to comply with anti-bribery laws and this policy. Appropriate due diligence will be conducted on third parties, and contractual provisions to prevent bribery will be included.

8. Reporting and Investigation

8.1 Reporting Concerns

Employees and stakeholders are encouraged to report any suspicions of bribery or corruption confidentially via:

- Their line manager or supervisor;
- The Company's whistleblowing or grievance procedure.

8.2 Investigations

All reports will be taken seriously, investigated confidentially, and impartially. The Company ensures protection against retaliation for those who report concerns in good faith.



8.3 Consequences of Non-Compliance

Breach of this policy may lead to disciplinary action including dismissal, termination of contracts, and potential legal prosecution.

9. Legal Framework

This policy reflects the Company's compliance with:

- The Bribery Act 2010;
- The Procurement Act 2023;
- The CCS Supplier Code of Conduct;
- Other relevant anti-corruption and procurement laws applicable to Lockrose.

10. Monitoring and Review

Lockrose will regularly review this policy and its implementation to ensure it remains effective and compliant with evolving legislation. Feedback and monitoring data will be used to improve anti-bribery and governance measures.

11. Approval and Implementation

This policy is approved by Lockrose management and is effective as of 26th November 2024. It will be communicated to all staff, contractors, and relevant stakeholders as part of the Company's commitment to ethical business practices.

Approved by:

Sam Evans
Managing Director
26th November 2024



LOCKROSE

The Clock House | Western Court | Alresford | Hampshire | SO24 0AA

www.lockrose.com