

Bribery and Corruption Policy

Policy Statement

Synergy Lifting Limited is committed to the highest standards of ethical conduct and integrity in its business activities in the UK and overseas. This policy outlines Synergy Lifting Limited position on preventing and prohibiting bribery, in accordance with the Bribery Act 2010. Synergy Lifting Limited will not tolerate any form of bribery by, or of, its employees, agents or consultants or any person or body acting on its behalf. Senior Management is committed to implementing effective measures to prevent, monitor and eliminate bribery.

Scope of this Policy

This policy applies to all Synergy Lifting Limited personnel within the UK. Every employee and associated person acting for, or on behalf of, Synergy Lifting Limited is responsible for maintaining the highest standards of business conduct. Any breach of this policy is likely to constitute a serious disciplinary, contractual and criminal matter for the individual concerned and may cause serious damage to the reputation and standing of Synergy Lifting Limited.

Synergy Lifting Limited may also face criminal liability for unlawful actions taken by its employees or associated persons under the Bribery Act 2010. All employees and associated persons are required to familiarise themselves and comply with this policy, including any future updates that may be issued from time to time by Synergy Lifting Limited.

The Bribery Act 2010 came into force on 1 July 2011. This policy covers:

- The main areas of liability under the Bribery Act 2010.
- The responsibilities of employees and associated persons acting for, or on behalf of, Synergy Lifting Limited.
- The consequences of any breaches of this policy.

Bribery Act 2010

Synergy Lifting Limited is committed to complying with the Bribery Act 2010 in its business activities in the UK.

Under the Bribery Act 2010, a bribe is a financial or other type of advantage that is offered or requested with the:

- Intention of inducing or rewarding improper performance of a function or activity.
- Knowledge or belief that accepting such a reward would constitute the improper performance of such a function or activity.

A relevant function or activity includes public, state or business activities or any activity performed in the course of a person's employment, or on behalf of another company or individual, where the person performing that activity is expected to perform it in good faith, impartially, or in accordance with a position of trust.



A criminal offence will be committed under the Bribery Act 2010 if:

- An employee or associated person acting for, or on behalf of, Synergy Lifting Limited offers, promises, gives, requests, receives or agrees to receive bribes.
- An employee or associated person acting for, or on behalf of, Synergy Lifting Limited offers, promises or gives a bribe to a foreign public official with the intention of influencing that official in the performance of his/her duties (where local law does not permit or require such influence).
- Synergy Lifting Limited does not have the defence that it has adequate procedures in place to prevent bribery by its employees or associated persons.

All employees and associated persons are required to comply with this policy, in accordance with the Bribery Act 2010.

Gifts and Hospitality

Synergy Lifting Limited Personnel must not use their position Synergy Lifting Limited to solicit any gifts (including by way of services) or cash from any Synergy Lifting Limited contractor, supplier or other third party for personal benefit. Gifts or entertainment from third parties must not be accepted if they could reasonably be regarded as likely to create a conflict of interest or materially influence a Synergy Lifting Limited business relationship with, or create an obligation to, a contractor, supplier or other third party – if in doubt, seek advice from the Company Secretary.

Synergy Lifting Limited prohibits the direct or indirect offer, provision or receipt of the following from external stakeholders:

- Gifts, entertainment, meals or advantage to or from domestic or foreign government officials.
- Gifts, entertainment, meals or advantage to or from stakeholders who are involved in competitively tendering to one of the Synergy Lifting Limited companies or who are evaluating a competitive tender from a Synergy Lifting Limited company.
- Gifts of cash, cash equivalents, or securities.
- Gifts, entertainment, meals or advantage in exchange for something of value.
- Gifts or entertainment which are inappropriate by their nature.
- Gifts, entertainment, meals or advantage that is personally given so as to avoid there being a formal record, unless they are:
 - Cleared by Synergy Lifting Limited Company Secretary.
 - Not intended to influence Synergy Lifting Limited objectivity or provide favour for any Synergy Lifting Limited company.
 - Not illegal under local or applicable foreign law.

The offer to Synergy Lifting Limited personnel of all such gratuities, gifts and hospitality must be recorded, whether they are accepted or not.

Facilitation payments (the practice of paying a small sum of money to a public official as a way of ensuring that they perform their routine, non-discretionary duties either promptly or not at all) are not permitted by Synergy Lifting Limited

Charitable and Political Donation

Synergy Lifting Limited considers that charitable giving can form part of its wider commitment and responsibility to the community. Synergy Lifting Limited supports a number of charities that are selected in accordance with objective criteria, following a risk assessment. Synergy Lifting Limited may also support fundraising events involving employees.

Working Overseas

Employees and associated persons conducting business on behalf of Synergy Lifting Limited outside the UK may be at greater risk of being exposed to bribery or unethical business conduct than UK-based employees. Employees and associated persons owe a duty to Synergy Lifting Limited to be extra vigilant when conducting international business.

Employees and associated persons are required to cooperate with Synergy Lifting Limited 's risk management procedures and to report suspicions of bribery to Line Managers, Directors or any member of the HR team. While any suspicious circumstances should be reported, employees and associated persons are required particularly to report:

- Close family, personal or business ties that a prospective agent, representative or joint-venture partner may have with government or corporate officials, directors or employees.
- A history of corruption in the country in which the business is being undertaken.
- Requests for cash payments.
- Requests for unusual payment arrangements, for example via a third party.
- Requests for reimbursements of unsubstantiated or unusual expenses.
- A lack of standard invoices and proper financial practices.

If an employee or associated person is in any doubt as to whether or not a potential act constitutes bribery, the matter should be referred to their line manager.

Employees Responsibilities

You must ensure that you understand and comply with this policy at all times. The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. All Synergy Lifting Limited Personnel are required to avoid any activity that might lead to, or suggest, a breach of this Policy.

You must notify the Synergy Lifting Limited Company Secretary, any Director or your line manager, as soon as possible if you believe or suspect that a conflict with this Policy has occurred, or may occur in the future. For example, if a third party offers you something to gain a business advantage with us, or indicates to you that a gift or payment is required to secure their business.

Record Keeping

Financial records must be kept and have appropriate internal controls in place which will provide evidence of the business reason for making payments to third parties.



You must ensure all expenses claims relating to hospitality, gifts or expenses related to third parties are submitted in accordance with Synergy Lifting Limited Travel and Expenses policy, and specifically record the reason for the expenditure.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties should be prepared and maintained with strict accuracy and completeness. No accounts shall be kept "off-book" to facilitate or conceal improper payments.

Reporting Suspected Bribery

Synergy Lifting Limited depends on its employees and associated persons to ensure that the highest standards of ethical conduct are maintained in all its business dealings. Employees and associated persons are requested to assist Synergy Lifting Limited and to remain vigilant in preventing, detecting and reporting bribery.

Employees and associated persons are encouraged to report any concerns that they may have to the line manager, Directors or any member of the HR Team as soon as possible. Issues that should be reported include:

- Any suspected or actual attempts at bribery.
- Concerns that other employees or associated persons may be being bribed.
- Concerns that other employees or associated persons may be bribing third parties, such as clients or government officials.

Action by Synergy Lifting Ltd

Synergy Lifting Limited will fully investigate any instances of alleged or suspected bribery. Employees suspected of bribery may be suspended from their duties while the investigation is being carried out. Synergy Lifting Limited will invoke its disciplinary procedures where any employee is suspected of bribery, and proven allegations may result in a finding of gross misconduct and immediate dismissal. Synergy Lifting Limited may terminate the contracts of any associated persons, including consultants or other workers who act for, or on behalf of, Synergy Lifting Limited who are found to have breached this policy.

Synergy Lifting Limited may also report any matter to the relevant authorities, including the Director of Public Prosecutions, Serious Fraud Office, Revenue and Customs Prosecutions Office and the police. Synergy Lifting Limited will provide all necessary assistance to the relevant authorities in any subsequent prosecution.

Review of Procedures and Training

Synergy Lifting Limited will regularly communicate its anti-bribery measures to employees and associated persons.

What to do if you are a Victim of Bribery and Corruption

It is important that you inform Synergy Lifting Limited Company Secretary, or your Line Manager, or any Director of the Company as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of any other form of unlawful activity.

Who is Responsible for this Policy?

Synergy Lifting Limited Managing Director will proactively champion this Policy and it has overall responsibility for ensuring this Policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Synergy Lifting Limited Company Secretary has primary and day-to-day responsibility for implementing this Policy and for monitoring its use and effectiveness and dealing with any queries on its interpretation.

Monitoring and Review

Synergy Lifting Limited Managing Director will monitor the effectiveness and review the implementation of this Policy regularly, considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible.

This Policy does not form part of any employee's contract of employment and it may be amended at any time.

Synergy Lifting Limited's reputation is based on the attitudes, integrity and skills of its workforce. As part of Synergy Lifting Limited employment procedures, identities and addresses, history of credit, criminal records and work histories of new employees are checked as appropriate.

Stephen Gaylor

A handwritten signature in black ink, appearing to read "S. Gaylor", written in a cursive style.

Managing Director
SYNERGY LIFTING LTD

Date: 09/10/2016