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Anti-Bribery and Corruption Policy

1. Introduction

This procedure forms part of a series of documents that identifies the requirements for the Sigmatex Business Management System in accordance with IATF16949, AS9100 and ISO9001.

2. Scope

This document outlines the Sigmatex UK Ltd. Anti-Bribery and Corruption Policy.

3. Responsibilities

HR Manager or their deputy are responsible for implementation, review and updates of this policy.

All employees of Sigmatex UK Ltd. are responsible for following this policy.

4. Procedure

With reference to the Bribery Act 2010, compliance with the Company's policy in relation to bribery and corruption is regarded as part of the contract of employment with Sigmatex (UK) Limited.

If an employee fails for any reason to follow the rules set out in this document, this may result in disciplinary action being taken, what could result in an individual's dismissal.

Such action will be taken in accordance with the Company's Disciplinary Procedures as laid down in the Company Handbook.

Bribery is the offer or receipt of any gift, loan, payment, reward, or other advantage to or from any person as an encouragement to do something which is dishonest, illegal or a breach of trust, in the conduct of the Company's business.

Corruption is the misuse of entrusted power for private gain.

To place this in context, you should be aware that if you engage in activities which are contrary to UK anti-bribery and corruption legislation, you could face up to 10 years in prison and/or an unlimited fine and the Company could also be liable to an unlimited fine and Government sanction.

This Policy document is not regarded as exhaustive but does give specific examples of situations and sets out the rules and procedures which should be followed.

If you are at any time uncertain as to whether your actions will comply with this Policy, you must seek guidance from a Company Director.

You should always act in accordance with the following provisions:-

- Behave in accordance with the Company's shared values.
- Use the resources of the Company in the best interests of the Company and do not misuse those resources.
- Make a clear distinction between the interests of the Company and your private interests to avoid any conflict of interest, and if such conflict does arise, you should report it to a Company Director immediately.
- Ensure that any community support, sponsorship, and charitable donations do not constitute bribery and if in doubt, you should consult a Company Director.
- Confidentially report to a Company Director, any incidents, risks and issues which are contrary to this policy document.
- Raise any issues regarding anti-bribery and corruption laws and any contravention of the Company's policy to a Company Director. Such concerns will be dealt with in line with the Company's Whistleblowing Policy (ref.: SIGM-1543646668-19274).
- Do not offer or accept bribes.
- Do not offer money to any public officials in order to speed up service or gain improper advantage. This type of bribery is a 'facilitation payment' and is illegal. If you are faced with a demand for a facilitation payment, you must:-
 - Actively resist the payment.
 - Inform a Company Director

By complying with this Policy, Sigmatex and its employees will not at any time knowingly breach any relevant anti-bribery and corruption legislation and also that by adhering to the Policy, the Company can demonstrate that it has adequate procedures in place to prevent such an activity.

You have an independent obligation to prevent bribery and corruption in the Company and to ensure that any interaction with external parties complies with the policy document and relevant laws.

5. References

Employee Code of Conduct (ref.: SIGM-1543646668-19275)

Whistleblowing Policy (ref.: SIGM-1543646668-19274)

6. Records

Document change records.

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