

### Ethical Code of Conduct Policy

- Staff must not offer or make any bribe, unorthodox or unauthorised payment of any kind to anyone.
- Staff must not solicit business by offering any bribe, unorthodox or unofficial personal payment to customers or potential customers.
- Staff must not accept any kind of bribe, unorthodox or unusual payment that would not be authorised by the Company in the ordinary course of normal business.
- Staff must clearly refuse any bribe or unorthodox payment and must do so in a manner that can lead to no misunderstanding or false expectation; and to report any such offers to line management immediately.
- Staff must report any breaches of this policy or of any applicable law even if by doing so they have to disclose their own wrongdoing. Such reports must be passed to line management immediately.
- The Company requires managers to maintain a working environment where staff can make reports of breaches of this policy in confidence and without fear of reprisals.
- The Company expects its business partners, suppliers and contractors to act with integrity and without thought or actions involving bribery and corruption and will, where appropriate, include clauses to this effect in contracts offered to any such third parties.
- The Company will actively investigate all reported allegations of fraud corruption or abuse of position for personal gain involving the Group and its staff, wherever they might occur.
- The Company undertakes that, except for knowingly reporting false accusations, every employee may report allegations without fear of retaliation.
- The Company and its staff will not make direct or indirect contributions to political parties, organisations or individuals engaged in politics, as a way of obtaining advantage in business transactions. The Company will publicly disclose all its political contributions.
- The Company will ensure that charitable contributions and sponsorships are not used as a subterfuge for bribery. The Company will publicly disclose all its charitable contributions and sponsorships.
- Compliance with this Ethical Code of Business Conduct is mandatory for all staff (including directors) and the Company will apply appropriate sanctions for violations of this Code and the policy.
- The Company will not channel improper payments through agents or other intermediaries.
- The Company undertakes properly documented due diligence before appointing agents and other intermediaries.
- All agreements with agents and intermediaries require the prior approval of senior management.
- Compensation paid to agents and other intermediaries must be appropriate and justifiable remuneration for legitimate services rendered.
- Agents and other intermediaries must contractually agree to comply with this policy and are provided with appropriate advice and documentation explaining this obligation.
- The Company contractually requires its agents and other intermediaries to keep proper books and records available for inspection by the Group, auditors or investigating authorities.
- The Company monitors the conduct of its agents and other intermediaries and has a right of termination in the event that they pay bribes or act in a manner inconsistent with this policy.
- With regards to contractors and suppliers, the Company conducts its procurement practices in a fair and transparent manner.
- The Company avoids dealing with contractors and suppliers known or reasonably suspected to be paying bribes. The Company undertakes due diligence, as appropriate, in evaluating prospective contractors and suppliers to ensure that they have effective anti-bribery policies.
- The Company makes this policy known to contractors and suppliers and requires their acceptance and adherence to this policy.
- The Company makes it clear that no employee will suffer demotion, penalty, or other adverse consequences for refusing to pay bribes, even if such refusal may result in the Group losing business.
- The Company has established and maintains an effective system of internal controls to counter bribery, comprising financial and organisational checks and balances over the Company's accounting and record keeping practices and other business processes related to this policy.
- Senior management of the Company monitor the policy and periodically review the policy's suitability, adequacy, and effectiveness, and implement improvements as appropriate.



John Bracken

**Chairman**

Latest Review:

April 2022

Next Review Date:

April 2023



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