



EHM Limited
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ANTI BRIBERY POLICY STATEMENT

EUGENE HARRINGTON MARKETING LTD values its reputation for ethical behaviour and for financial probity and reliability. It recognises that over and above the commission of any crime, any involvement in bribery will also reflect adversely on its image and reputation. Its aim therefore is to limit its exposure to bribery by:

- setting out a clear anti-bribery policy, communicating this policy and any relevant procedures to employees notifying them of disciplinary actions or prosecutions if not adhered to
- establishing and implementing anti-bribery procedures as appropriate
- undertaking appropriate due diligence measures before engaging others to represent the Company in its business dealings
- monitoring and reviewing the risks and the effectiveness of any anti-bribery procedures that are in place

The Company prohibits the offering, giving, solicitation or 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, agent or other person or body acting on behalf of the Company
- to gain any commercial, contractual or regulatory advantage for the Company in a way that is unethical
- in order to gain any personal advantage (pecuniary or otherwise) for the individual or anyone connected with the individual.

This policy prohibits any inducement that 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 that 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 normal and appropriate hospitality or the giving of a gift on a festival or at another special time, providing they are customary in a particular market, are proportionate and are properly recorded. If you are in any doubt as to whether a potential act constitutes bribery, the matter should be referred to a Director before proceeding.

The Company takes full responsibility for implementing this policy, and any suspicion of bribery should be reported in confidence to a Director who has overall responsibility for bribery prevention.

Signed:

Mr Steve Carpenter
Commercial Director EHM Ltd

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EHM safe at work



EHM Limited is a trading name of Eugene Harrington Marketing Limited
Registered office: 73 Cornhill, London EC3V 3QQ
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