



Tomorrow's Technology - Today!

Micro Trax Designs Ltd

Unit 22 Roman Way
Coleshill Industrial Estate,
Coleshill, Birmingham B46 1HQ
Tel: +44 (0)1675 465654
Fax: +44 (0)1675 466759

Anti-Bribery and Corruption and Ethical Conduct Policy

Microtrax Designs Ltd anti-bribery policy exists to set out the responsibilities of the Company and those who work for us regarding observing and upholding our zero-tolerance position on bribery and corruption.

It also exists to act as a source of information and guidance for those working for the Company. It aims to help them recognise and deal with bribery and corruption issues, as well as understand their responsibilities as an employee or contractor of Microtrax Designs Ltd.

Microtrax Designs Ltd will always be focused on conducting their business in an ethical and honest manner by implementing and enforcing systems designed with zero tolerance to ensure that bribery and corruption is prevented.

Microtrax will always be committed to acting professionally, fairly and with integrity in all our business dealings in whatever country we operate.

Microtrax Designs will constantly uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which we operate. We are bound by the laws of the UK, including the Bribery Act 2010, regarding our conduct both at the home and abroad.

The Company recognises that bribery and corruption are punishable by up to ten years of imprisonment and a fine. If our company is discovered to have taken part in corrupt activities, we may be subjected to an unlimited fine, be excluded from tendering for public contracts and face serious damage to our reputation. It is with this in mind that we commit to preventing bribery and corruption in our business and take our legal responsibilities seriously.

Who is covered by the policy?

This anti-bribery policy applies to all employees (whether temporary, fixed-term or permanent), consultants, contractors, trainees, apprentices, seconded staff, home workers, casual workers, agency staff, volunteers, interns, agents, sponsors or any other person or persons associated with us (including third parties) or any of our subsidiaries or their employees, no matter where they are located (within or outside of the UK). The policy also applies to Officers, Trustees, Board and/or Committee members at any level.

In the context of this policy, third-party refers to any individual or organisation our company meets and works with. It refers to actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisors and government and public bodies – this includes their advisors, representative and officials, politicians, and public parties.

Any arrangements our company makes with a third party is subject to clear contractual terms, including specific provisions that require the third party to comply with minimum standards and procedures relating to anti-bribery and corruption.

Definition of Bribery

Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision. A bribe refers to any inducement, reward or object/item of value offered to another individual to gain commercial, contractual, regulatory or personal advantage.

Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law.



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Bribery is illegal. Any representative of Microtrax Designs including Directors, Employees or our contractors must not engage in any form of bribery, whether it be directly, passively (as described above), or through a third party (such as an agent or distributor). They must not bribe a foreign public official anywhere in the world. They must not accept bribes in any degree and if they are uncertain about whether something is a bribe or a gift or act of hospitality, they must seek further advice from either Colin Henley, Mark Dawson, or Philip Plant, Directors of Microtrax Designs Ltd.

Ethical Conduct

The Company aims for the highest possible standards of ethical conduct in all its activities and expects the conduct of all associated with Microtrax Designs Ltd to reflect this. Dishonesty of any kind will not be tolerated .

The acceptance of gifts and hospitality from clients/customers, suppliers and potential suppliers must not give the appearance that employees or the Company may be unduly influenced in the decisions that they make in respect of clients/customers, suppliers or in any other aspect of their work.

All gifts and hospitality given or received, of whatever value, must be entered in the Register. (Register to be kept by Mark Dawson, Colin Henley, or Philip Plant) Any gifts received will be kept by Colin Henley, Philip Plant or Mark Dawson and used for company employee raffle prizes periodically through the year.

No personal gifts of a value more than £10 should be accepted from a client/customer, supplier, or potential supplier without express permission in writing from your Mark Dawson, Colin Henley or Philip Plant.

Acceptance of hospitality, such as lunch or drinks receptions, should be kept within common sense limits and should always be authorised by Colin Henley, Mark Dawson or Philip Plant.

Allowing gifts or hospitality to influence any purchasing/business decisions that you may make on behalf of the Company or to otherwise influence the way in which you perform your duties is an act of gross misconduct and would be dealt with through the Company disciplinary process.

All our Suppliers and our business partners should aim to comply with all relevant anti-corruption law and are expected to create possible mechanisms for preventions

I acknowledge that I understand the aims and objectives of the Microtrax Designs Ltd Policy relating to the Anti- Bribery, Corruption and ethical conduct described above

Company ...
Name
Position

Signed
Date