

**ENGINEERED SYSTEMS (ELECTRICAL) LTD**  
**Unit 1 Waterside Industrial Park, Waterside Road,**  
**Leeds, LS10 1RW**

**BRIBERY AND CORRUPTION POLICY**

**PURPOSE:**

ENGINEERED SYSTEMS (ELECTRICAL) LTD are fully aware that bribery and corruption is a criminal offence and that our organization could be liable if a senior person in our company commits a bribery offence. We could also be liable if someone who performs services for us (employees, agents etc.) pays a bribe specifically to get business, keep business, or gain a business advantage for our company.

**SCOPE:**

In order to comply with the Bribery Act, it is our objective to have adequate procedures in place to prevent bribery, these procedures will be proportionate to the size of the business and the risk of bribery. ENGINEERED SYSTEMS (ELECTRICAL) LTD have a zero-tolerance policy towards bribery and it is our objective to prevent, deter and detect bribery.

**CONTROL MEASURES:**

- ENGINEERED SYSTEMS (ELECTRICAL) LTD do not accept any bribes or improper inducements offered to our company.
- ENGINEERED SYSTEMS (ELECTRICAL) LTD never use third parties to channel bribes to others or otherwise encourage bribery.
- Senior Management are committed to delivering this policy and ensure that we conduct our business without bribery. They are active in ensuring that employee's and key people that we do business with understand our policy of zero tolerance of bribery.
- An important part of our policy is risk assessment. We have thought about the bribery risks we may face, researched the markets we operate in and researched the companies we conduct business with. This includes simple things such as investigating a country's bribery or corruption levels before doing business there. Some of our existing procedures and controls relating to company expenditure, accounting and commercial contracts also provide some protection against bribery.
- Our Financial Accounts are monitored and reviewed on an annual basis by an independent body.
- Complete due diligence when employing people and perform appropriate checks on persons who will be representing the company.
- Communicate our policies and procedures to employees and others, so that we enhance awareness and deter bribery by making it clear how we do business.
- Never pay bribes or offer improper inducements to anyone for any purpose.

**CONSEQUENCES OF NON-COMPLIANCE:**

If bribery is found at any place of production, we require the supplier or other business we work with to implement a corrective action plan within a suitable time limit. Where we find that our suppliers or other companies that we work with have breached this policy, committed repeat violations or failed to take corrective action within a suitable time limit, may lead to termination of any working agreement or contract with them.

The consequences for employees committing an offence are very serious. As well as criminal proceedings, any employee in breach of this policy shall be relieved of their duties.

**Signed by the executive responsible for Compliance:**



**Michael Keith**  
**Managing Director**  
**Date: 28<sup>th</sup> August 2025**