	Site	S Drive	Reference	Type	Retention
	GRP	GRP.10.03.02	001	Policy	US+3yr
	Revision	Originator	Approved	Issue Date	Review Due
	01	RHA	KCH	NOV 2022	NOV 2024
Description	Anti-Bribery Policy				



Anti-Bribery Policy


Item	Comment
Document Owner	HR Manager at Slicker Recycling Ltd
Master Copy Storage	
➤ Electronic	S Drive
➤ Paper	Uncontrolled
Retention	Until Superseded + 3 years

Revision History (Last 3 Changes)			
Revision	Date	Initials	Comments / Changes
01	NOV 2022	RHA	New format revision and reissue of previous policy

Who does this policy apply to?

This policy applies to all of the following at Slicker Recycling (alphabetical order):-

- Directors and Senior Management in the company
- Engineering staff
- HSEQ staff
- Laboratory staff
- Maintenance staff
- Operations staff
- Transport staff (e.g. drivers, operatives, etc)
- Any other job role or function, where it is deemed to be relevant
- All Slicker Recycling employees (including associated companies)
- All visitors to Slicker Recycling facilities
- All contractors working for (or on behalf of) Slicker Recycling

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Anti-Bribery Policy

Purpose

The Bribery Act 2010 introduced new criminal offences for bribery for both individuals and companies. The Act came into force on 1st July 2011.

Policy

Slicker Recycling Ltd are committed to applying the highest standard of ethical conduct and integrity in its business activities in the UK and overseas. Every employee and individual acting on behalf of Slicker Recycling Ltd is responsible for maintaining our reputation and for conducting company business honestly and professionally.

The organisation considers that bribery and corruption has a detrimental impact on business by undermining good governance and distorting free markets. Slicker Recycling benefits from carrying out business in a transparent and ethical way, helping to ensure that there is honest, open and fair competition in all our dealings within our markets in the UK and abroad.

Where there is a level playing field, Slicker Recycling can lead the market through innovation and ethical culture within the industry and its players and by delivering excellent service and products to our customers.

We believe that transparent, fair conduct helps to foster deeper relationships of trust between the organisation and its business partners and customers. It is vital for the organisation's reputation and future growth.

Slicker Recycling does not tolerate any form of bribery, whether direct or indirect by, or of, its employees, consultants, sub-contractors or any persons or companies acting for them or on their behalf. The board and senior management are committed to implementing and enforcing effective systems throughout the organisation to prevent, monitor and eliminate bribery.

Implementation

The anti-bribery policy applies to all employees, including sub-contractors, agency workers and consultants. All employees and other individuals acting for the organisation are required to familiarise themselves and comply with the organisation's anti-bribery policy with immediate effect.


A bribe is a financial advantage or other reward that is offered to, given to, or received by an individual or company (whether directly or indirectly) to induce or influence that individual or company to perform public or corporate functions or duties improperly.

Employees and others acting for or on behalf of the organisation are strictly prohibited from making, soliciting or receiving any bribes or unauthorised payments.

As part of its anti-bribery measures, Slicker Recycling is committed to transparent, proportionate, reasonable and bona fide hospitality and promotional expenditure. Such expenditure must be authorised in advance, by one of the Management team.

Non-Compliance

A breach of Slicker Recycling's anti-bribery policy by an employee will be treated as grounds for disciplinary action, which may result in a finding of gross misconduct. Employees and other individuals acting on behalf of Slicker Recycling should note that bribery is a criminal offence that may result in up to 10 years imprisonment and/or an unlimited fine for the individual and an unlimited fine for the organisation.

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Slicker Recycling will not conduct business with service providers, agents or representatives that do not support our anti-bribery objectives. Slicker reserve the right to terminate its contractual arrangements with any third parties acting for them, playing their part in helping to detect and eradicate bribery. Therefore, all employees and others action for, or on behalf of, the organisation are encouraged to report any suspected bribery.

Slicker Recycling Ltd will work pro-actively with the relevant enforcement bodies to ensure that any criminal activity is pursued appropriately.

Slicker Recycling Ltd will support any individuals who make such a report, provided that it is made in good faith.