



Anti-Bribery and Corruption Policy

J Swingler Transport growth and reputation over the past 100 years have been built upon trust and reputation through service delivery and collaboration with our interested parties.

Furthermore, the UK Anti-bribery and Corruption legislation applies to all activities of our business, wherever they may be delivered. This policy therefore applies to ALL activities of J Swingler Transport, whatever the local law, practice or custom may be.

Bribery is the offer or receipt of any gift, loan, payment, reward or other advantage to or from any person as an encouragement to do something which is dishonest, illegal or a breach of trust, in the conduct of the Company's business.

Corruption is the misuse of entrusted power for private gain.

J Swingler Transport condone any transaction that can be considered as Bribery or Corruption in all day-to-day matters by both the company and any employee.

You should at all times act in accordance with the following behaviours: -

- behave honestly, be trustworthy and set a good example, using Company resources correctly
- report any conflicts of interest between J Swingler Transport and your private interests.
- ensure that any community support, sponsorship and charitable donations do not constitute bribery, and if in doubt you should consult the Company Proprietor.
- raise any issues regarding anti-bribery and corruption, Company policies and activities to the Company Proprietor for recording and confidentially investigation.
- do not offer or accept bribes, gifts or hospitality to or from clients, contractors, suppliers, other third parties or public officials.
- Seek guidance from line management/proprietor if unsure.

Compliance with the Company's policy in relation to bribery and corruption is regarded as part of your contract of employment and includes disciplinary action where a breach is confirmed.

Compliance with this policy, ensures that you and the Company will not at any time knowingly breach any relevant Anti-bribery and Corruption legislation and that by adhering to the Policy the Company can demonstrate the efficacy of our processes in place to prevent such activity.

A handwritten signature in black ink, appearing to be 'Anthony Thompson', is written over a horizontal line.

Signed: _____
Anthony Thompson
Proprietor

BMS 008	Rev 2	2 January 2024
Reviewed Michelle Woodward		Renewal due Jan 2025