

Bribery & Corruption Policy

Fileder Filter Systems is committed to working in accordance with the Bribery Act 2010. The Company supports a culture of openness and transparency in all business transactions and accordingly all employees are required to comply with this policy.

Employees shall not use their employment for personal gain and shall seek to uphold and enhance the standing of the Company by maintaining an unimpeachable standard of honesty, impartiality and integrity in all their business relationships. Should any employee be offered, regardless of acceptance or not, bribes, gifts, hospitality, or expenses they should inform their Line Manager immediately.

Offering or accepting a 'gift' which is considered outside 'reasonable expectations' are both illegal and dismissal offences and can be attributed to anti-competitive behaviour.

Employees responsible for, or involved with, procurement on behalf of the Company should take particular care to ensure that there can be no criticism that unequal treatment has been given to external organisations involved in a tender process which may influence the outcome of business transactions.

Employees should not accept any gifts or hospitality offered to them unless the hospitality is principally to discuss business matters at either a lunch, dinner, conference, trade show or other proportionate event. Employees should speak to their managers if they are unsure about accepting anything. Hospitality, gifts or expenses must not be offered or perceived to be offered to employees of other companies with the promise or giving of an advantage. The question should be asked 'what is the intention of the gift?'. Hospitality and gifts from Fileder employees given to customers, suppliers etc must not influence the outcome of business transactions.

Fileder will continue to provide genuine business hospitality and carry out proportionate and reasonable promotional activities. These however are controlled by the Marketing Department, overseen by the Managing Director, all of whom are briefed in operating within current legislation.

The payment of donations to political parties or charities to obtain a business advantage is prohibited. All charity payments are to be disclosed to Senior Management.

Failure to disclose offers of bribes, gifts, hospitality or expenses is a breach of the disciplinary rules and could result in dismissal. Accepting any of the aforementioned, if deemed to be outside the remit of 'reasonable', could also result in disciplinary actions, which again could lead to dismissal.

Personnel are also provided with 6-monthly refresher training.

Anti-Competitive Behaviour

Fileder works in accordance with Chapters I & II of the Competition Act 1998 and Articles 81 and 82 of the EC Treaty, which prohibits anti-competitive behaviour. These laws prohibit anti-competitive agreements between businesses and the abuse of a dominant position in the market, including but not exclusive to, bid rigging, market sharing, sharing information, agreeing with competitors to reduce production to increase prices and long-term exclusive contracts with customers and suppliers.

Any employee breaching these laws will be in breach of Fileder's disciplinary rules and could result in dismissal, as well as legal prosecution.

Owner Business Services Department - JE
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