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Northern Divers Engineering: Anti-Bribery Process

Objective: Bribery blights lives. Its immediate victims include firms that lose out unfairly. The wider victims are government and society, undermined by a weakened rule of law and damaged social and economic development. At stake is the principle of free and fair competition, which stands diminished by each bribe offered or accepted. The objective of this process is to establish a clear and effective anti-bribery framework for Northern Divers Engineering (NDE), ensuring that all operations are conducted ethically, transparently, and in compliance with anti-bribery laws and regulations. UK bribery Act 2010:

<https://assets.publishing.service.gov.uk/media/5d80cfc3ed915d51e9aff85a/bribery-act-2010-guidance.pdf>

i. **Step 1: Assessing the Risk of Bribery**

- ii. **Risk Assessment Framework:** NDE will conduct an annual risk assessment to identify, evaluate, and prioritise the risk of bribery across all business areas and activities. This includes evaluating the following factors:
 - **Geographic Locations:** Identify regions with higher risks of bribery due to weak enforcement or a history of corruption.
 - **Business Sectors and Activities:** Analyse specific sectors (e.g., government contracts, procurement) for potential exposure to bribery risks.
 - **Type of Relationship:** Review interactions with customers, suppliers, agents, subcontractors, and intermediaries to assess the likelihood of bribery or corrupt practices.
 - **Internal and External Factors:** Assess internal controls, business culture, and the nature of external parties involved in the supply chain or client base.
- iii. **Regular Reviews:** The risk assessment will be updated regularly, especially when entering new markets or engaging in new high-risk activities, to ensure continuous vigilance.

iv. **Step 2: Implementing Anti-Bribery Measures**

1. **Development of Anti-Bribery Policy:**

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- **Clear Guidelines:** NDE will create a clear, written anti-bribery policy outlining acceptable and unacceptable behaviors. This policy will be distributed across all departments, partners, and stakeholders.
- **Practical Steps:** The policy will include specific guidelines on gifts, hospitality, charitable donations, and political contributions to prevent any unethical practices.
- **Proportionality:** The measures will be proportionate to the identified risks, meaning more rigorous controls will be applied where the risks are highest.

2. Training and Awareness:

- **Employee Training:** NDE will conduct mandatory anti-bribery training for all employees, focusing on the identification of bribery risks, reporting mechanisms, and the legal implications of bribery.
- **Third-party Training:** NDE will offer training and orientation to subcontractors, agents, and other external parties to ensure they understand and comply with the company's anti-bribery measures.

3. Whistleblowing Mechanism:

- Establish a secure, anonymous whistleblowing system where employees, subcontractors, and agents can report suspected bribery or corrupt practices without fear of retaliation.


4. Internal Controls and Monitoring:

- **Auditing:** Regular internal audits will be conducted to monitor compliance with anti-bribery measures.
- **Monitoring High-Risk Transactions:** Transactions with third parties (e.g., agents, subcontractors) identified as high risk will be subject to enhanced scrutiny, including checks on invoices, contracts, and payments.

v. Step 3: Ensuring Top-Level Commitment

1. Leadership Involvement:

- NDE's top-level management, including the Board of Directors, will publicly commit to the prevention of bribery and corruption.
- Senior leaders will regularly communicate the importance of ethical behavior, reinforce the company's zero-tolerance approach to bribery, and lead by example.

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2. **Accountability:**

- A designated Anti-Bribery Officer (ABO) will oversee the implementation and enforcement of anti-bribery policies and procedures.
- Top management will be held accountable for the effectiveness of the anti-bribery measures, and they will regularly review reports to assess the success of anti-bribery initiatives.

3. **Continuous Improvement:**

- Leadership will regularly review the anti-bribery program to ensure it remains effective and responsive to new risks or changes in business activities. They will commit to making necessary adjustments based on feedback, audits, and reports from employees and external stakeholders.

vi. **Step 4: Due Diligence on Organisations, Subcontractors, and Agents**

1. **Due Diligence Framework:**

- **Screening and Background Checks:** NDE will implement a robust due diligence process for selecting subcontractors, agents, suppliers, and any third-party representatives. This process will include background checks, review of any prior legal issues related to bribery, and assessments of financial practices.
- **Risk Assessment of Third Parties:** Subcontractors, suppliers, and agents will be classified according to the level of risk they pose, with higher-risk parties undergoing more thorough investigations.

2. **Contracts and Agreements:**

- **Anti-Bribery Clauses:** Contracts with subcontractors, suppliers, and agents will include explicit anti-bribery clauses, stating the company's expectations and the legal consequences of any violation.
- **Monitoring Compliance:** Regular checks and audits will be performed on third parties to ensure they adhere to anti-bribery standards, and failure to comply will lead to termination of agreements or legal action.

3. **Ongoing Monitoring:**

- Continuous monitoring of third-party activities will be conducted throughout the term of the relationship to ensure compliance with the company’s anti-bribery policy.
- Any identified risks or violations by a subcontractor, agent, or supplier will be thoroughly investigated, and corrective actions will be taken, which may include disengagement from the third party.

vii. Review and Feedback

1. Annual Review:

- The entire anti-bribery program, including risk assessments, policies, training programs, and due diligence processes, will be reviewed annually by senior management to ensure it remains effective.
- Feedback from employees, third parties, and audits will inform any changes or improvements to the anti-bribery strategy.

2. Continuous Engagement:

- The company will maintain an ongoing dialogue with external experts, legal advisors, and relevant authorities to stay informed of best practices and emerging risks related to bribery and corruption.



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J Sparrowe
Managing Director
 01 March 2025