

**OATES ENVIRONMENTAL LTD  
10 Carr Crofts Drive  
Leeds  
LS12 3AL**

## **Bribery Act Policy**

OATES ENVIRONMENTAL LTD are fully aware that bribery is a criminal offence and that our organisation 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.

Therefore we never pay bribes or offer improper inducements to anyone for any purpose. OATES ENVIRONMENTAL LTD do not accept any bribes or improper inducements offered to our company.

We also never use third parties to channel bribes to others or otherwise encourage bribery.

OATES ENVIRONMENTAL LTD have a zero tolerance policy towards bribery and it is our objective to prevent, deter and detect bribery.

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.

OATES ENVIRONMENTAL LTD give top level commitment to delivering this policy which means the people in the best position can ensure we conduct our business without bribery and can be active in making sure that employee's and key people we do business with understand our policy and zero tolerance of bribery.

An important part of our policy is risk assessment. We have thought about the bribery risks we may face and researched the markets we operate in and companies we deal 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.

We also carry out due diligence when taking people on and do appropriate checks on people who will be representing us.

It is vital that we communicate our policies and procedures to employees and others so we enhance awareness and deter bribery by making it clear how we do business. This is usually done either through internal training or verbal instruction.

**Signed by the person responsible:**

**Simon Oates  
Managing Director**