



## LL Plastic Ltd

# Anti-Bribery and Corruption Policy

**Document title:** Anti-Bribery and Corruption Policy

**Company:** LL Plastic Ltd

**Approved by:** Lajos Tolly - Director

**Policy owner:** Director / Management

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## 1. Policy statement

LL Plastic Ltd is committed to conducting all business honestly, fairly, transparently, and in compliance with all applicable laws and regulations. We take a zero-tolerance approach to bribery and corruption.

We do not offer, give, request, accept, or tolerate bribes or improper payments of any kind, whether directly or indirectly, in the private or public sector. This applies in all locations where we operate and to all business dealings with customers, suppliers, contractors, agents, intermediaries, and public bodies.

LL Plastic Ltd is committed to maintaining proportionate procedures designed to prevent bribery and corruption in line with the Bribery Act 2010.

## 2. Purpose

The purpose of this policy is to:

- prevent bribery and corruption in connection with LL Plastic Ltd's business activities;
- set clear rules for employees, directors, contractors, consultants, and anyone acting on behalf of the company;
- protect the company, its staff, and its business partners from legal, financial, and reputational harm;
- support a culture of integrity, fair dealing, and accountable decision-making.

### **3. Scope**

This policy applies to:

- all directors and employees of LL Plastic Ltd;
- agency workers, temporary staff, and casual workers;
- contractors, consultants, and subcontractors;
- agents, representatives, intermediaries, and anyone acting for or on behalf of LL Plastic Ltd;
- joint venture or project partners where relevant to LL Plastic Ltd's activities.

### **4. What is bribery?**

Bribery is offering, promising, giving, requesting, agreeing to receive, or accepting a financial or other advantage in order to induce or reward improper performance of a function or activity, or to influence a decision improperly.

A bribe can include, for example:

- cash payments;
- gifts or hospitality intended to secure an improper advantage;
- kickbacks or secret commissions;
- inflated discounts, rebates, or credit notes given without proper commercial justification;
- jobs, favours, or other benefits offered to influence a business decision;
- payments made through third parties to do something the company could not lawfully do directly.

The Bribery Act 2010 creates offences for bribing another person, being bribed, bribing a foreign public official, and for a commercial organisation failing to prevent bribery by associated persons.

### **5. What is corruption?**

Corruption is the abuse of entrusted power or position for private gain. It can include bribery, undisclosed conflicts of interest, dishonest favoritism, secret commissions, or misuse of company position or resources.

### **6. Prohibited conduct**

No person covered by this policy may:

- offer, promise, give, request, or accept a bribe;
- make facilitation payments or "grease payments" to speed up routine actions;
- offer anything of value to improperly influence a tender, contract award, planning matter, inspection, regulatory process, or purchasing decision;
- use agents, consultants, distributors, or other third parties to make improper payments on the company's behalf;

- make off-book payments, false invoices, misleading expense claims, or concealed commissions;
- accept gifts, hospitality, or benefits that could influence, or appear to influence, business judgment.

## **7. Facilitation payments**

LL Plastic Ltd prohibits facilitation payments. These are unofficial payments made to secure or speed up routine actions by officials or other decision-makers.

If anyone is asked to make such a payment, they must refuse where it is safe to do so and report the matter to management as soon as possible.

## **8. Gifts and hospitality**

Reasonable and proportionate gifts and hospitality may be permitted where they are:

- lawful;
- modest in value;
- occasional;
- transparent;
- properly recorded;
- not intended to influence a decision improperly; and
- unlikely to create a conflict of interest or the appearance of one.

The following are not permitted:

- cash or cash equivalents;
- lavish or excessive hospitality;
- gifts or entertainment during a live tender, pricing exercise, or procurement decision;
- anything offered in return for a commercial advantage;
- repeated gifts or hospitality from the same party that could create undue influence.

Any gift or hospitality above a modest level set by management should be declared and approved in advance.

## **9. Donations, sponsorship, and charitable support**

Any charitable donation, sponsorship, community support, or marketing contribution made by LL Plastic Ltd must:

- be lawful and transparent;
- have a legitimate business or charitable purpose;
- not be used to obtain an improper business advantage;
- be accurately recorded in the company's books and records;
- be approved by a director before payment or commitment.

Political donations must not be made unless specifically approved at director level and confirmed as lawful.

## **10. Third parties and business partners**

Bribery risk often arises through third parties. LL Plastic Ltd will apply reasonable and proportionate due diligence before engaging agents, consultants, introducers, contractors, or similar representatives, especially where they may interact with customers, public bodies, procurement teams, or regulators on our behalf. This reflects the Ministry of Justice guidance on risk-based due diligence.

Checks may include:

- verifying identity and business credentials;
- understanding the services to be provided;
- checking reputation and conflicts of interest;
- ensuring fees and commissions are commercially reasonable;
- using written agreements with clear anti-bribery obligations;
- refusing arrangements that are unclear, cash-based, secretive, or commercially unjustified.

## **11. Procurement, sales, and tendering**

All procurement and sales decisions must be made on objective commercial grounds, including quality, price, capability, reliability, service, and compliance.

Employees and representatives must not:

- manipulate quotations or tender outcomes;
- provide or accept secret incentives;
- influence decisions through improper personal benefits;
- bypass approval processes to favour a supplier, customer, or intermediary.

Particular care must be taken when dealing with public sector bodies, local authorities, grant-funded projects, and large merchant or framework procurement processes.

## **12. Books, records, and financial controls**

LL Plastic Ltd will keep accurate and complete books, records, and accounts. No undisclosed or unrecorded account, fund, payment, or asset may be established or maintained.

All payments must:

- relate to genuine goods or services;
- be supported by proper documentation;
- be approved under the company's normal financial controls;
- be recorded accurately in the accounting records.

False descriptions, misleading invoices, and disguised payments are prohibited.

## **13. Conflicts of interest**

All staff and directors must avoid situations where personal interests conflict, or may appear to conflict, with the interests of LL Plastic Ltd.

Any actual or potential conflict of interest must be disclosed promptly to management. Relevant decisions must then be managed openly and appropriately.

## **14. Reporting concerns**

Anyone covered by this policy must report promptly if they:

- are offered a bribe;
- are asked to make an improper payment;
- suspect bribery, corruption, fraud, kickbacks, or secret commissions;
- see suspicious behaviour by a colleague, supplier, contractor, customer, or intermediary;
- become aware of inaccurate records that may conceal improper conduct.

Reports should be made to the Director or designated manager immediately.

The UK government states that suspected bribery and corruption can be reported to the police, and that the SFO and NCA have key roles in investigating serious international bribery and corruption matters.

## **15. Protection for those raising concerns**

LL Plastic Ltd will not tolerate retaliation against anyone who raises a concern in good faith, even if the concern is not ultimately proven.

Any retaliation, victimisation, intimidation, or deliberate concealment of wrongdoing may lead to disciplinary action.

## **16. Responsibilities**

### **Directors and management**

Directors and management are responsible for:

- setting the tone from the top;
- promoting a culture of integrity;
- ensuring proportionate anti-bribery controls are in place;
- assessing bribery risk where relevant;
- reviewing concerns and taking appropriate action;
- monitoring compliance with this policy.

## **Employees and associated persons**

All employees and associated persons are responsible for:

- reading and complying with this policy;
- avoiding prohibited conduct;
- using good judgment in gifts, hospitality, and third-party dealings;
- keeping accurate records;
- reporting concerns immediately.

## **17. Training and communication**

This policy will be communicated to relevant staff and, where appropriate, to contractors, agents, and other business partners.

Training or briefing will be provided on a proportionate basis, taking account of role, risk exposure, and level of authority. The Ministry of Justice guidance identifies communication and training as a core part of effective anti-bribery procedures.

## **18. Breaches of this policy**

Any breach of this policy may result in disciplinary action, up to and including dismissal, termination of contract, or cessation of business relationship.

Where appropriate, LL Plastic Ltd may also report matters to the police, regulators, or other authorities.

## **19. Monitoring and review**

LL Plastic Ltd will monitor the effectiveness of this policy and review it periodically, and at least annually, or sooner if there is a material change in business activities, markets, supply chains, or legal/regulatory expectations.

This reflects the monitoring and review principle in the Ministry of Justice guidance.