


TITLE Anti-Bribery and Corruption Policy Statement				
REFERENCE PP Policy 06 Rev 3	PREPARED BY Sue Alsop	APPROVED BY Andrew Golding	DATE ISSUED 01 st February 2018	PAGE 1 OF 1

The purpose of this policy is to give information and guidance on recognizing and dealing with bribery and corruption.

Bribe – means any illegal payment as specified in this policy.

Fraud – means any international act or emission made to secure an unfair or unlawful gain.

Pioneer Pump is committed to conducting itself fairly, honestly and lawfully in all its business dealings and relationships globally and has a zero tolerance approach to bribery and corruption.

Pioneer Pump has a top level commitment to the elimination of bribery, both in respect of offer and acceptance, by all employees. We believe we have robust systems and controls in place which embrace the principles of compliance with the Act and constantly monitor and review our procedures. At all times the Company will comply with the Bribery Act 2010 and any subsequent legislation.

Bribery is considered by Pioneer as misconduct, leading to disciplinary action up to and including summary dismissal. Further action may also be taken involving the Police in accordance with the Bribery Act 2010 if the Company believes a criminal offence has been committed. Should any employee be aware of any instance of bribery or any suspicious conduct they must immediately report this in good faith to one of the Directors without fear of retaliation of any kind.

It is important that employees who organise and/or attend any corporate hospitality events do so on the strict understanding that this is proportionate to the work they are doing and their relationships with the third parties involved. There are occasions therefore, where corporate events are arranged that will generate goodwill and build relations with clients. The acceptance of gifts of low monetary value such as corporate give-aways, or other items of nominal value is acceptable provided the gift does not influence decision-making and the person is under no obligation to accept it.

The use of Company funds, assets, or personnel for any unlawful, improper, or unethical purpose is strictly prohibited. Employees and representatives are expected to conduct Company business in compliance with all applicable laws in the countries in which the Company does business.

Company employees and representatives are prohibited from directly or indirectly making, promising, authorising, or offering anything of value to a Foreign Official on behalf of the Company.

A zero-tolerance approach to bribery and corruption is communicated to all suppliers, contractors and business partners at the outset of our business relationship with them.

Signed: - 

Andrew Golding – Managing Director

Date: - ...01st February 2018.....