

AMF MECH LTD

ANTI-BRIBERY, CORRUPTION & COMPETITION LAW COMPLIANCE POLICY:

Reviewed: Within the last 12 months

Approved by: Director Adam Fleming

Applies to: All employees, subcontractors, consultants, and suppliers

1. Purpose of This Policy

1.1 This policy sets out our commitment to conducting all business activities with integrity, transparency, and in compliance with all applicable laws, including:

- **Bribery Act 2010**
- **Competition Act 1998**
- All other relevant UK and international anti-bribery, corruption, fraud, and competition laws

1.2 We operate a zero-tolerance approach to bribery, corruption, fraud, and anti-competitive behaviour.

2. Prevention of Fraud, Bribery and Malpractice

2.1 We maintain processes designed to prevent, detect, and respond to fraud and malpractice, including:

- Segregation of duties in financial authorisations
- Mandatory documentation for all procurement and payments
- Monitoring of gifts, hospitality, and conflicts of interest
- Clear reporting channels for concerns
- Internal checks and reviews of financial and operational activity

2.2 All employees are required to act honestly and report any suspected wrongdoing immediately.

3. Compliance With the Bribery Act 2010

3.1 We regularly review our processes against the requirements of the Bribery Act 2010, including:

- Risk assessments covering operational, financial, and third-party risks
- Periodic policy reviews (at least annually)
- Training and guidance for staff
- Due diligence on subcontractors, suppliers, and partners

3.2 We prohibit:

- Offering, giving, or accepting bribes
- Providing improper gifts or hospitality
- Facilitation payments
- Any behaviour that may improperly influence a business decision

4. Reporting and Investigating Suspected Bribery, Corruption or Anti-Competitive Behaviour

4.1 All personnel must immediately report concerns relating to:

- Bribery or attempted bribery
- Fraud, theft or financial irregularities
- Anti-competitive practices (price fixing, bid-rigging, market sharing, etc.)
- Corrupt behaviour by employees or third parties

4.2 Reports can be made to the designated Compliance Contact (see Section 6).

All reports will be:

- Investigated promptly and confidentially
- Escalated to a Director where appropriate
- Recorded and handled in accordance with internal investigation procedures
- Followed by disciplinary or legal action where required

4.3 We prohibit retaliation against anyone who reports concerns in good faith.

5. Ensuring Compliance With Anti-Bribery and Corruption Laws

5.1 Compliance is supported through:

- Mandatory adoption of this policy
- Training and communication for all staff
- Supplier and subcontractor due diligence
- Contracts requiring compliance with anti-bribery and corruption legislation
- Periodic internal reviews to test effectiveness

5.2 Non-compliance may result in disciplinary action, contract termination, or legal proceedings.

6. Designated Person for Reporting Concerns

6.1 All concerns relating to bribery, fraud, corruption or anti-competitive behaviour should be reported to:

Designated Compliance Contact:

Name: Adam Fleming

Role: Director / Compliance Lead

Email: AdamF@amfmep.co.uk

Telephone: 01737 947701

This role is held by a Director registered at Companies House.

7. Ensuring Compliance With Competition Law

7.1 We ensure compliance with the Competition Act 1998 through:

- Prohibiting price fixing, market sharing, bid rigging, and information exchange with competitors
- Maintaining independence in tendering and pricing decisions
- Training relevant staff on competition law obligations
- Requiring all employees to avoid any discussions or arrangements that could reduce competition

8. Detecting and Avoiding Anti-Competitive Behaviour

8.1 A We prevent and detect anti-competitive behaviour by:

- Reviewing tendering and procurement processes
- Monitoring employee engagement with competitors
- Requiring transparency in commercial decisions
- Ensuring staff understand how to recognise anti-competitive risks
- Investigating any suspicious conduct reported internally or externally

9. Supplier and Micros-Provider Statement

9.1 T As a supplier and contractor (including Micros services where applicable), we confirm that:

- We comply with all relevant anti-bribery, corruption and competition laws
- We maintain arrangements to detect and avoid anti-competitive behaviour
- We have processes for reporting and investigating potential bribery, corruption or anti-competitive actions
- We review this policy at least annually
- This policy is formally approved by a Director listed on Companies House

SIGNED BY

Adam Fleming Company Director
for and on behalf of AMF Mech Ltd



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Signed Date:

.....10/08/2025.....

Expiry Date:

.....10/08/2026.....

