

# Silverstone Cerakote Ltd Anti-Bribery Act 2010 Policy

## Document Control

Version	Date	Review	Changes Made	Written By	Reviewed By	Position
1.0	January 2023	January 2025	Initial Policy	Director	Director	Policy Writer
2.0	January 2025	January 2026	Revised Policy	Ellie Clarkson	Director	Policy Writer

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## 1.0 Introduction

Silverstone Cerakote Ltd is fully committed to maintaining high ethical standards and conducting all business operations with integrity, fairness, and transparency. This policy reflects our commitment to comply with the Bribery Act 2010, which prohibits bribery and corrupt practices in all forms, both in the UK and internationally. Our zero-tolerance approach to bribery and corruption applies to all employees, suppliers, contractors, and partners.

We understand that bribery can take many forms, including offering, giving, receiving, or soliciting something of value to influence a business outcome or gain an unfair advantage. Silverstone Cerakote Ltd seeks to uphold its reputation by strictly prohibiting these practices.

## 2.0 Purpose

The purpose of this policy is to ensure compliance with the Bribery Act 2010 and to outline the processes and responsibilities for preventing, detecting, and addressing bribery and corrupt practices within Silverstone Cerakote Ltd and its supply chain. The policy establishes guidelines for employees and suppliers to ensure that no unethical payments, inducements, or corrupt actions are undertaken.

## 3.0 Scope

This policy applies to all employees, contractors, suppliers, subcontractors, and other business partners working with or on behalf of Silverstone Cerakote Ltd. It covers all business activities, including interactions with public officials, customers, suppliers, and other third parties, both domestically and internationally.

## 4.0 Compliance with the Bribery Act 2010

Silverstone Cerakote Ltd and its employees must comply fully with the Bribery Act 2010, which outlines four main offences:

- **Bribing Another Person:** Offering, promising, or giving a financial or other advantage to someone to induce them to perform their duties improperly.
- **Being Bribed:** Accepting or receiving a bribe as an inducement or reward for performing a function or activity improperly.

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- **Bribery of Foreign Public Officials:** Offering or giving anything of value to a foreign public official with the intention of influencing them to secure an advantage in business.
- **Failure to Prevent Bribery:** A corporate offence where an organisation fails to prevent bribery committed by persons associated with it.

Silverstone Cerakote Ltd requires all employees and suppliers to:

- Never offer, give, or accept bribes, kickbacks, or facilitation payments in any form.
- Refrain from engaging in corrupt practices to gain business or influence business decisions.
- Conduct due diligence on third parties to ensure they uphold ethical standards and comply with the Bribery Act 2010.

### 5.0 Anti-Bribery Controls

Silverstone Cerakote Ltd has implemented robust anti-bribery controls to prevent bribery in its operations and supply chain:

- **Gifts and Hospitality:** All gifts, hospitality, and entertainment must be approved in advance and must be reasonable and proportionate. Lavish or inappropriate gifts, entertainment, or payments are prohibited.
- **Third-Party Due Diligence:** Due diligence is conducted on all third parties to assess potential risks of bribery. Suppliers and contractors must demonstrate a commitment to ethical business practices and comply with this policy.
- **Contracts:** All contracts and agreements with suppliers and partners include provisions that address compliance with the Bribery Act 2010 and this policy.
- **Financial Transparency:** Financial records are maintained with transparency and accuracy, and no false entries or payments are allowed. This ensures that all transactions are recorded appropriately.

### 6.0 Reporting and Whistleblowing

All employees, contractors, and suppliers are encouraged to report any suspicions or instances of bribery or corruption through Silverstone Cerakote Ltd.'s confidential whistleblowing channels. Reports can be made anonymously if desired, and we guarantee that no retaliation will be taken against anyone raising concerns in good faith.

Employees and suppliers must report any instance of:

- Offering or receiving bribes.
- Unethical gifts, hospitality, or payments.
- Suspicious activities that may be linked to bribery.

#### Whistleblower Reporting Channels:

- Whistleblower Hotline: [Insert Hotline Number]
- Email: [Insert Email Address]
- In-Person Reporting: Directly to the Compliance Manager at [Insert Office Location].

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Silverstone Cerakote Ltd is committed to investigating all reports thoroughly and taking corrective action where necessary.

### 7.0 Training and Awareness

Silverstone Cerakote Ltd provides regular anti-bribery and corruption training to all employees and suppliers to ensure compliance with the Bribery Act 2010. This training covers:

- Recognising bribery and corrupt practices.
- Reporting suspected bribery or corruption.
- Understanding the legal and ethical obligations under the Bribery Act 2010.

All employees and relevant third parties must complete mandatory anti-bribery training as part of their induction and periodically throughout their employment or engagement.

### 8.0 Implementation of the Policy

Silverstone Cerakote Ltd ensures the effective implementation of this policy by:

- **Governance:** The Compliance Manager oversees the implementation and enforcement of this policy, ensuring all business practices align with the Bribery Act 2010.
- **Risk Assessment:** Regular assessments of business activities are conducted to identify and address potential bribery risks.
- **Supplier Engagement:** All suppliers and business partners are required to comply with this policy. They must demonstrate their commitment by signing anti-bribery agreements and participating in audits when necessary.
- **Monitoring:** Regular monitoring of business practices and transactions is conducted to ensure compliance with anti-bribery standards.

Failure to comply with this policy may result in disciplinary action, including termination of employment or contracts, as well as potential legal consequences under the Bribery Act 2010.

### 9.0 Monitoring and Continuous Improvement

Silverstone Cerakote Ltd regularly monitors and reviews its anti-bribery controls to ensure they remain effective. The company is committed to continuously improving its processes in response to emerging risks and legal developments. Regular audits and reviews will be conducted, and corrective actions will be implemented when needed.

### 10.0 Document Review and Revision

This policy will be reviewed annually and updated to ensure ongoing compliance with the Bribery Act 2010 and other relevant legislation.

## **Silverstone Cerakote Ltd Anti-Bribery Act 2010 Policy**

This Bribery Act 2010 Policy outlines the company's zero-tolerance approach to bribery and corrupt practices. It includes implementation details, reporting channels, training, and monitoring strategies, ensuring that Silverstone Cerakote Ltd maintains its commitment to ethical and transparent business operations.