

*Bribery is the offer or receipt of any gift, loan, payment, reward or other advantage to or from any person as an encouragement to do something which is dishonest, illegal or a breach of trust, in the conduct of the Company's business.*

## Policy statement

Bribery is a criminal offence. Falcon Tower Crane Services Ltd (FTCS) do not and will not pay bribes or offer improper inducements to anyone for any purpose, nor do we or will we, accept bribes or improper inducements.

It is our policy to conduct all our business in an honest and ethical manner.

## Who is covered by the policy?

This anti-bribery policy applies to all employees or any other person or persons associated with us (including third parties). The policy also applies to Board, and/or Committee members at any level.

In the context of this policy, third-party refers to any individual or organisation our company meets and works with. It refers to actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies – this includes their advisors, representatives and officials, politicians, and public parties.

Any arrangements our company makes with a third party is subject to clear contractual terms, including specific provisions that require the third party to comply with minimum standards and procedures relating to anti-bribery and corruption. To use a third party as a conduit to channel bribes to others is a criminal offence. We do not and will not engage indirectly in or otherwise encourage bribery.

## What is and what is NOT acceptable

FTCS have a zero tolerance towards bribery and aim to maintain anti-bribery compliance. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. Any non-employee who breaches this policy may have their contract terminated with immediate effect.

FTCS will constantly uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which we operate. We are bound by the laws of the UK, including the Bribery Act 2010.

FTCS recognises that bribery and corruption are punishable by up to ten years of imprisonment and a fine. If our company is discovered to have taken part in corrupt activities, we may be subjected to an unlimited fine, be excluded from tendering for public contracts, and face serious damage to our reputation. It is with this in mind that we commit to preventing bribery and corruption in our business and take our legal responsibilities seriously.

As an employee of FTCS, you must ensure that you read, understand, and comply with the information contained within this policy, and with any training or other anti-bribery and corruption information you are given.

All employees and those under our control are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this anti-bribery policy.

## How to Raise a Concern

**If you are offered a bribe, or are asked to make one, or if you suspect that any bribery, corruption or other breach of this policy has occurred or may occur, you must notify your manager or the Managing Director as soon as possible.**



**Andrew Brown**  
Managing Director  
Falcon Tower Crane Services Ltd