

Logistics without limits



Bibby Distribution Limited

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Compliance with UK Bribery Act (2011)

The UK Bribery Act ('the Act') came into force on 1 July 2011 and made it an offence to give or receive a bribe in connection with a company's business. This applies irrespective of who would profit from the transaction, and covers bribery committed both inside and outside the UK.

The Act includes a new corporate offence of 'failing to prevent bribery', even when the bribery is carried out without the company's knowledge by an associated person (such as an employee, agent, subsidiary or business partner). The only defence available to a company in such circumstances is to show that it has adequate procedures in place to prevent bribery.

In response, Bibby Distribution has reviewed its policy, an outline of which is covered below:

Bibby Distribution Services (Holdings) Limited: Anti-bribery and corruption policy summary:

Bibby Distribution Services (Holdings) Limited (BDSH) and its subsidiaries are committed to the highest standards of integrity, honesty and ethical practice across all areas of business. This includes zero tolerance of bribery and corruption.

BDS(H) requires all employees to comply with all applicable laws and regulations in all jurisdictions in which they do business, and to operate with the highest standards of integrity, including full compliance with this policy.

BDS(H) requires all subsidiaries, associated companies, agents, suppliers and other business partners (collectively 'business partners') to comply with all applicable laws and regulations and operate with the highest standards of integrity, including complying in full with this policy, in all their dealings with, and on behalf, of BDS(H).

Failure of employees to comply with this policy may lead to disciplinary action, including dismissal and reporting of the offence to appropriate authorities. Failure of business partners to comply with this policy may lead to immediate termination of formal and informal agreements with BDS(H) and legal action.

Possible breaches of the policy and queries on its implementation should be reported to Paul Cullingford BDS(H) Chief Financial Officer and in his absence Sarah Palmer, Head of Audit and Commercial.

Areas included in the revised policy include:

- Accepting gifts, entertainment and hospitality
- Giving gifts, entertainment and hospitality
- Paying finder's fees
- Procuring professional services
- Sourcing bank debt

Relevant risk assessments also cover:

- Sourcing potential acquisitions
- Procuring professional services to support acquisitions
- Obtaining debt funding
- Sourcing major central suppliers
- Sourcing new business
- Procuring the services of subcontractors at depot level
- Use of external agencies to meet short-term staffing requirements

For a full copy of the policy (if required) please contact Paul Cullingford, Chief Financial Officer, at our Duke Street address.