



Jays Logistics (South West) Ltd

Anti-Bribery & Anti-corruption Ethics policy

Jays logistics is committed to operating fairly, ethically and within the law, we will not tolerate any form of bribery or corruption. As part of the government's commitment to eradicating bribery, the bribery act 2010 came into force on July 2011. At Jays we run our business honestly and will not tolerate bribery or corruption in our dealings or relationships or from our colleagues. We have systems in place to prevent corruption and bribery and require all of employees and associated persons to make decisions in line with it.

This policy sets out the responsibilities of every person with whom jays is associated to observe and uphold our zero tolerance position on bribery and corruption. When we say "associated person" this term includes but is not limited to, any individual or organisation that Jays comes into contact with during the course of its business, this could be potential clients, customers, suppliers, distributors, government officials, agents, advisors etc.

This policy applies to all Jays business dealings and transactions, in all countries in which we operate. There are no exceptions and violation of this policy may be grounds for dismissal, termination of contract, prosecution and additional criminal or civil sanctions.

If the laws, codes of conduct or other regulations in a particular country are more restrictive than ours or require government approval of the transaction, then more restrictive requirements must be complied with.

What constitutes Bribery

Bribery is offering, giving, receiving or soliciting of any item of value to influence the actions of an official or other persons in charge.

Such activities are a criminal offence, under the bribery act 2010, there are 4 offences;

- Bribing another person (section 1)
- Being bribed (section 2)
- Bribing a foreign public official (section 6)
- Failure of a commercial organisation to prevent bribery (section 7)

Version: Jays SC 1	Review Date: 03-01-2026
Reviewer: S GUMM	Approver: M.BEAVAN



Section 1 – Bribing another person

Where person (A) offers, promises or gives financial or other advantages to another person (person B) and person (A) intends for person (B) to perform relevant functions or activities improperly then person (A) is committing an offence.

A relevant function or activity means one that is;

- Connected with the business
- Performed in employment
- Performed on behalf of another body, that should be performed in good faith, or impartially and/or by a person in a position of trust

Section 2 – Being Bribed

Where a person requests or agrees to receive or accepts a financial or other advantage intending that a relevant function or activity is performed improperly, he commits an offence.

Section 6 – Bribing a foreign public official

A person who bribes a foreign public official commits an offence if;

- The influence them in their capacity as a foreign official
- Obtain or retain business or an advantage on the conduct of business

Section 7 – Failure of a commercial organisation to prevent Bribery

A relevant commercial organisation is guilty of an offence if a person associated with it then bribes another person intending to obtain or retain business for the organisation, or an advantage in the conduct of the organisation's business.

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Gifts, hospitality, entertainment and expenses

All those associated with Jays Logistics must not engage in any activity that might lead to, or suggest, a conflict of interest within the business.

The offering, or giving of gifts, hospitality and entertainment must;

- Not be given/received with the intention of influencing a third party to obtain or retain business or a business advantage, to reward the provision or retention of business or the business advantage, or in explicit or implicit exchange for favours or benefits
- Not constituted an offence under the bribery act
- Comply with local law
- Be given at corporate level not an individual level
- Not include cash or a cash equivalent
- Be appropriate, reasonable, proportionate, given in good faith at the appropriate time
- Be given openly
- Not be offered to, or accepted from, government officials without the express prior to approval of a member of Jays Logistics

Facilitation payments and kickbacks

Jays does not make, and will not accept, facilitation payments or kickbacks of any kind.

Facilitation payments are typically small, unofficial payments made to secure or expedite, a routine administrative action by the UK or foreign government officials.

Kickbacks are another way of describing a bribe and typically consist of payments made in return for a business favour or advantage.

You must not engage in any activity that you feel might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by Jays Logistics.

Jays logistics recognises that in some countries facilitation payments are permitted by law. Jays logistics is subject to provisions preventing facilitation payments in the UK, and therefore, are prohibited.

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Donations

Jays Logistics does not make contributions to political parties. We only make charitable donations that are legal and ethical under local laws and practices. No offer of a donation of any kind can be offered, made, or donated on behalf of Jays Logistics without the consent of a member of the board of directors.

Your responsibilities

You must ensure you have read and understood this policy. You must comply with its terms at all times when acting on behalf of Jays Logistics. You must inform Jays Logistics of the details of any third party engaged by yourself on behalf of Jays logistics and you must ensure they agree to be bound by and comply with the terms of this policy.

If you employ staff that act as agents on behalf of Jays logistics or engage others to do so (where permitted) you must ensure that those persons are fully aware of the terms in this policy, and where necessary provide training.

Under no circumstances must you offer gifts or cash to any of our colleagues. Any such offer shall be refused. Colleagues are entitled to accept reasonable and proportionate corporate hospitality or entertainment, subject to the provisions stated in above paragraphs. All such offers must be declared by colleagues, irrespective of whether or not they are accepted.

Record keeping

You must ensure that you retain documentation identifying and relating to any third party engaged by you on behalf of Jays Logistics

Communication

This policy will be communicated to our suppliers, contractors, agents and business partners who will be asked to review the policy and agree to abide by the terms laid out.

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Raising a concern and seeking guidance

Employees, suppliers, or agents can make contact confidentially with Jays Logistics
By either;

Email

Address

Anyone who raises a concern in good faith will not be criticised or penalised in any way, even if it is proven after investigation that they were mistaken. Any form of reprisal or victimisation against anyone who has raised a genuine concern is forbidden and will not be tolerated, this in its self will be treated as a disciplinary matter.

Penalties

Violations of the UK bribery act 2010 are a serious matter and could result in significant criminal and/or civil penalties for Jays Logistics and those individuals involved.

Penalties could include imprisonment for up to 10 years with unlimited fines for individual and the business. Senior staff who were aware of the bribes may also face penalties.

Fines imposed on individuals will not be paid by the company, a violation will also result in disciplinary action, up to and including termination of employment or other contract.

Signed

Jon White

Managing Director

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