



## **1. Policy**

SwiftPath Logistics rejects bribery in all forms. No employee, contractor, consultant, or associated person may offer, give, receive, or accept a bribe in any circumstance where there is a risk of bribery.

## **2. Meaning of Bribery**

Bribery includes giving or receiving any financial or other advantage to influence a person to perform a duty improperly or to gain a business advantage. This applies whether the advantage benefits the company or a third party.

## **3. Business Entertaining**

Reasonable business entertaining, such as meals, is generally permitted. Employees must ensure that:

- Expense claims are transparent and explain the relationship with the parties entertained.
- Entertaining does not exceed normal limits (e.g., £50 per person plus VAT without prior approval).
- Any entertainment that could be construed as bribery must be avoided or approved in advance by management.

## **4. Reporting of Hospitality and Gifts**

All hospitality or gifts exceeding £100 must be reported to management.

## **5. Policy Breaches**

Any breach of this policy may result in disciplinary action, including summary dismissal, depending on severity.

## **6. Whistleblowing and Guidance**

Employees are encouraged to report any suspected bribery confidentially. Anyone approached with a bribe should refuse and immediately inform management.