DOCUMENT:	**PSE-POL-04**
VERSION:	3
REVIEW DATE:	20/03/2026

ANTI BRIBERY, CORRUPTION & FRAUD POLICY STATEMENT

It is the policy of Pro Steel Engineering Ltd to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery, corruption and fraudulent activities, and we are totally committed to acting professionally, fairly and with integrity in all our dealings wherever we operate.

This policy applies to all individuals working at all levels and grades, including senior managers, directors, employees (whether permanent, fixed term or temporary), consultants, contractors, and any other person providing services to us.

Bribery

A bribe is a financial or other advantage offered or given:

- To anyone to persuade them to, or reward them for, performing their duties improperly, or
- To any public official with the intention of influencing the official in the performance of his duties.

This policy does not prohibit giving and receiving promotional gifts of low value and normal and appropriate hospitality. However, in certain circumstances gifts and hospitality may amount to bribery and all employees must –

- Tell us about any conflicts of interest
- Tell us about any gifts or hospitality they receive, and ask us to approve them

We will not provide gifts or hospitality with the intention of persuading anyone to act improperly or to influence them in the performance of their duties.

Corruption

We do not make, and will not accept, facilitation payments or “kickbacks” of any kind. All employees must avoid any activity that might lead to, or suggest, that a facilitation payment will be made or accepted by us.

The company will never enter into any price fixing activities or attempt to manipulate tender values on behalf of any third party organisations or perceived competitors.

We do not make contributions of any kind to political parties.

No charitable donations will be made for the purpose of gaining any commercial advantage.

We will keep financial records and have appropriate internal controls in place which will evidence the business reason for making any payments to third parties.

All expense claims relating to hospitality, gifts or expenses incurred to third parties must be approved prior to expenditure. All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, must be prepared and maintained with strict accuracy and completeness.

No accounts must be kept “off-book” to facilitate or conceal improper payments.

Fraudulent activities

PSE will be vigilant regards potential fraudulent malpractice, which will not be tolerated under any circumstances. Some example of which are as follows;

- Accounting fraud: Manipulating financial records.

- Payroll fraud: Falsifying hours worked or paid.
- Invoice fraud: Sending false invoices for undelivered products or services.
- Money laundering: Concealing the origins of illegally obtained funds.
- Vendor fraud: Colluding with suppliers.
- Phishing attacks: Deceptive emails or messages.
- Wire transfer fraud: Unauthorised transfers of funds.
- Embezzlement: Misappropriating company funds.
- Identity theft: Stealing personal information.
- Billing scams: Fraudulent billing practices.

Competition law and fair trading

Pro Steel Engineering will fully comply with all applicable Competition legislation in accordance with the requirements of the Enterprise and Regulatory Reform Act 2013. As a result of this, the company shall not involve itself in any of the following activities;

- Restrictive Agreements: Agreements that prevent, restrict, or distort competition.
- Abuse of Dominant Market Position: This includes predatory pricing and other practices that reduce competition.
- Mergers and Takeovers: Conducting an unregulated merger that may result in a substantial lessening of competition.
- Public Restrictions: Restrictions on competition that are not justified by market efficiency.

Pro Steel Engineering will comply with these requirements to avoid any potential legal penalties and maintain a fair market environment.

Compliance and reporting

Employees will be encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage to their Line Manager, or a Member of the Senior Leadership Team / Board of Directors. No employee will suffer any detriment as a result of raising genuine concerns about bribery, even if they turn out to be mistaken.

Internal control systems and procedures will be subject to audit the effectiveness of the policy and procedures, and to demonstrate compliance with Competition Law under the internal audit process.

The company is also audited annually by the Company Accountancy auditors to demonstrate compliance with anti-bribery and corruption laws and to ensure no fraudulent activities have taken place.

Pro Steel Engineering Ltd will carry out a Risk Assessment and mitigate any identified risks relating to potential bribery, corruption and fraudulent malpractice. This will be reviewed annually.

The responsibility for the implementation of the policy lies with the Directors.

This policy will be reviewed at least annually for its effectiveness.



Signed: Richard Selby, Director
Date: 18th March 2026