

## Anti-Bribery & Corruption Policy Statement 2025

---

At NMT, we are committed to conducting business lawfully, ethically, and with integrity. Whether dealing with internal or external parties, and regardless of our geographical locations, bribery and corruption are entirely unacceptable and will not be tolerated under any circumstances.

This Anti-Bribery and Corruption (ABC) policy outlines our commitment to preventing acts of bribery and corruption, providing clear standards of conduct that must be adhered to by all employees. This policy is designed to meet global legal requirements and aims to help you understand what constitutes prohibited conduct, ensuring that bribery and corruption are avoided.

### Who This Policy Applies To:

This policy applies to all officers, employees (full-time, part-time, and temporary workers such as consultants or contractors), and anyone acting on behalf of NMT, no matter their role or location. It is the responsibility of each individual to ensure compliance with this policy in every aspect of their work.

NMT also requires third parties—agents, distributors, suppliers, joint venture partners, etc.—to comply with anti-bribery standards. When engaging third parties, we must perform adequate due diligence and maintain oversight to prevent any corrupt practices.

Failure to comply with this policy, intentionally or otherwise, may lead to disciplinary actions, including dismissal and possible legal consequences, including criminal liability.

## Getting Help:

If you have any doubts regarding your obligations under this policy, please contact one of the following for guidance:

- James Ambridge
  - Email: [hiredesk@nmtcranes.co.uk](mailto:hiredesk@nmtcranes.co.uk)
  - Address: NMT Crane Hire Ltd, Telegraph House, Windsor Road, Bedford MK42 9TA
  - Tel: 01234 331177
  - Website: [www.nmtcranes.co.uk](http://www.nmtcranes.co.uk)
- Gerry White
  - Email: [hiredesk@nmtcranes.co.uk](mailto:hiredesk@nmtcranes.co.uk)
  - Address: NMT Crane Hire Ltd, Telegraph House, Windsor Road, Bedford MK42 9TA
  - Tel: 01234 331177
  - Website: [www.nmtcranes.co.uk](http://www.nmtcranes.co.uk)

## What is Bribery?

Bribery refers to offering, giving, accepting, or soliciting any financial or other advantage to induce or reward improper performance of duties. It includes the following acts:

- Offering or accepting any financial or non-financial benefit with the intention to induce improper behavior.
- Offering or accepting anything of value to influence decisions or actions that would not be performed in a lawful or ethical manner.

### Bribery can take various forms, including:

-Money or cash equivalents (e.g., shares)

---

-Excessive gifts, entertainment, or hospitality

---

-Kickbacks, illegal commissions, or rebates

---

-Facilitation payments to expedite normal business processes

---

-Unlawful charitable donations or political contributions

---

## How to Identify a Bribe

**If you are unsure whether something constitutes a bribe, ask yourself the following questions:**

- Am I being asked to pay something that exceeds the reasonable cost of the service?
- Are the gifts or hospitality I am offering or receiving appropriate and justifiable?
- Could this payment or gift be seen as influencing an impartial decision-making process?

## Policies and Procedures

### General Prohibition:

NMT has a zero-tolerance approach to bribery and corruption. Any action, whether giving, receiving, or even promising a bribe, is strictly prohibited. This policy applies to all dealings, whether in the public or private sector, and ensures that our operations remain free from any corrupt practices.

### Gifts, Hospitality, and Expenses:

While gifts and hospitality can help build professional relationships, they must always be appropriate, reasonable, and in line with NMT's Hospitality and Expenses Policy. Lavish gifts or excessive hospitality that might create the perception of influencing decisions or obtaining favorable treatment are not acceptable.

### Facilitation Payments:

Facilitation payments, typically small bribes offered to expedite government services (e.g., customs clearance), are strictly prohibited. The only exception is in extreme cases where such a payment is made to protect personal safety. These situations must be reported to your local anti-bribery officer immediately.

## Third-Party Agents and Partners:

NMT can be held responsible for acts of bribery committed by agents, distributors, suppliers, and joint venture partners. Therefore, we require all third parties to comply with NMT's anti-bribery standards.

Before entering into agreements with third parties, appropriate due diligence must be conducted to assess any corruption risks. Due diligence checks may include:

- Verifying the legitimacy and reputation of the third party
- Confirming that they have adequate anti-bribery policies in place
- Ensuring commissions and payments align with industry norms

## Dealing with Public Officials

Interactions with public officials pose particular bribery risks due to stringent regulations in many jurisdictions. Providing gifts, hospitality, or payments to public officials to influence their official capacity is strictly prohibited. Prior approval from the anti-bribery officer is required for any dealings involving public officials, including:

- Fees or commissions
- Gifts and hospitality
- Charitable donations or sponsorships

## Compliance with the Policy

The Group Compliance Officer oversees adherence to this policy. However, all employees are individually responsible for understanding and complying with its requirements. Regular audits will be conducted to ensure ongoing compliance.

### Training and Awareness:

All employees must undergo periodic training to understand and comply with this policy. If you believe you need further training, please contact your HR manager or anti-bribery officer.

## Whistleblowing

NMT encourages employees to report any concerns related to bribery or corruption without fear of retaliation. Reports can be made confidentially to your local anti-bribery officer or via the Whistleblowing Policy.

Retaliation against anyone reporting suspected wrongdoing will not be tolerated, and all reports will be handled discreetly and in good faith.

Date: 09.12.2024

Signed: *G White*  
Director on behalf of NMT Crane Hire Ltd.

Review date 08.12.2025

Form No: F3010	Issue No: 01	Date: 01/15
----------------	--------------	-------------