

Anti-Bribery, Corruption, and Fraud Policy
ADR Carriers Limited
Church View, Newton Arlosh, Wigton, CA7 5ET
Registered in England: 14798586
Email: hazload@adrcarriers.net

Policy Statement

ADR Carriers Limited is committed to conducting its business with integrity, transparency, and accountability. We have a zero-tolerance approach to bribery, corruption, and fraud and are dedicated to upholding the highest standards of ethical behavior in all our operations.

Scope

This policy applies to all employees, directors, contractors, consultants, and any third parties acting on behalf of ADR Carriers Limited. It covers all activities, transactions, and dealings in which the company is involved, whether domestic or international.

Definitions

1. **Bribery:** Offering, giving, receiving, or soliciting anything of value to influence a decision or secure an improper advantage.
 2. **Corruption:** Abuse of entrusted power for private gain, including actions that subvert integrity in business practices.
 3. **Fraud:** Intentional deception or dishonesty intended to result in financial or personal gain.
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Policy Objectives

1. **Compliance with Laws**
 - Ensure compliance with the UK Bribery Act 2010 and other applicable anti-bribery and anti-fraud legislation.
2. **Prohibition of Bribery and Corruption**
 - Strictly prohibit offering, giving, or accepting bribes, kickbacks, or any other improper payments, whether directly or through third parties.
3. **Prevention of Fraud**
 - Actively identify, prevent, and address fraudulent activities within the organization and its operations.
4. **Gifts and Hospitality**

- Establish clear guidelines to ensure that any gifts or hospitality offered or received are reasonable, proportionate, and transparent, and do not influence business decisions.
 - 5. **Third-Party Relationships**
 - Conduct due diligence on third parties to ensure they align with ADR Carriers Limited's commitment to ethical business practices.
 - 6. **Reporting and Whistleblowing**
 - Encourage employees and stakeholders to report suspected cases of bribery, corruption, or fraud without fear of retaliation.
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Responsibilities

Management

- Demonstrate a commitment to ethical conduct and ensure that this policy is implemented effectively.
- Provide training and resources to employees to promote understanding and compliance.

Employees

- Adhere to the principles and practices outlined in this policy.
- Report any incidents or suspicions of bribery, corruption, or fraud promptly.

Contractors and Partners

- Comply with ADR Carriers Limited's anti-bribery and anti-corruption standards when acting on the company's behalf.
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Implementation and Enforcement

1. **Training and Awareness**
 - Regular training will be provided to ensure employees understand their responsibilities under this policy.
 2. **Monitoring and Auditing**
 - Periodic audits will be conducted to ensure compliance with the policy and to identify any potential vulnerabilities.
 3. **Disciplinary Action**
 - Violations of this policy may result in disciplinary action, up to and including termination of employment or contract, and may be reported to legal authorities.
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Reporting

Employees and third parties can report concerns or violations to hazload@adrcarriers.net or anonymously through the company's whistleblowing procedures.

Approved by:
Stuart Dargue
Director, ADR Carriers Limited

Date: 01/12/2023

Review Date: 01/12/2028

By adhering to this policy, ADR Carriers Limited demonstrates its unwavering commitment to integrity and ethical business practices.