

DEMETER ENVIRONMENTAL LTD

Business Integrity Policy

Business Integrity Policy Statement

DEMETER ENVIRONMENTAL Ltd is committed that its activities reflect its ethical values of honesty, fairness and transparency. We will not tolerate corruption, bribery and unfair, anti-competitive activities and we insist on the same integrity in all aspects of its business and from all those we do business with.

DEMETER ENVIRONMENTAL Ltd forbids the payment and receiving of bribes on behalf, and will maintain an adequate system of procedures designed to prevent bribery by any person associated with the company

We will conduct relationships with clients and business partners in the spirit of transparency, openness and trust, with a due regard of commercial and personal confidentiality. We do not permit the establishment or maintenance of any undisclosed or unrecorded account, fund or asset, and insists that proper and full records must be made of all transactions on behalf of the company.

All of our employees shall act in an ethical, honest and professional way in all of their business dealings, and may not offer, give or receive any gift or payment which is, or may be construed as a bribe. Any demand for, or offer of a bribe, inducement to act in any way contrary to our principles will be rejected immediately.

We have ensured that all employees are aware of this policy and will receive guidance and supervision on ethical behaviour and legal compliance. Ultimately, if employees fail to comply with this policy, they are liable to disciplinary action up to and including dismissal.

Preventing Bribery

Our 'no tolerance' of bribery relies on each one of us choosing to always do the right thing. All this takes is a few simple commitments:

We will always:

- Comply with this Anti-Bribery and Corruption Policy
- Be guided by our vision and values of openness and honesty
- Record all activities and transactions accurately, completely and transparently
- Follow appropriate due diligence and risk mitigation procedures before proceeding with any contract or other arrangement
- Seek advice if unsure how to proceed

We will never:

- Participate in any form of corrupt behaviour
- Use company funds, in the form of payments or gifts and hospitality for any unlawful, unethical or improper purpose
- Authorise, make, tolerate or encourage, or invite or accept, any improper payments to obtain, retain or improve business
- Permit anyone to offer or pay bribes or make facilitation payments on our behalf, or do anything else we would not be permitted to do ourselves
- Offer or give anything of value to a public official (or their representative) to induce or reward them for acting improperly in the course of their public responsibilities

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- Offer or accept gifts or hospitality, if we think this might impair objective judgement, improperly influence a decision or create a sense of obligation, or if there's a risk it could be misconstrued or misinterpreted by others.

DEMETER ENVIRONMENTAL Ltd will continuously review the policy to ensure it is appropriate and that it is working effectively, in doing this DEMETER ENVIRONMENTAL Ltd will consult with trade unions and staff representatives, particularly with regard to any proposed amendments to the policy contents

Signed: 

Position: Director.....

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