



## Introduction

The HF Group Bribery policy applies to all companies within the HF Group, which includes – HF Mechanical & Electrical, HF Fire and Security, HF Comms and HF Controls.

It is HF Group Ltd policy to conduct its business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, and with integrity, in all our business dealings and relationships.

HF Group Ltd upholds and remains bound by the laws of the UK, including the Bribery Act 2010, in respect of its conduct.

The purpose of this policy is to:

1. Set out our responsibilities, and of those working for us, in observing and upholding our position on bribery and corruption; and
2. Provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues.

Bribery and corruption are punishable for individuals by up to ten years' imprisonment and if HF Group Ltd is found to have taken part in corruption it could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation. We therefore take our legal responsibilities very seriously.

In this policy, third party means any individual or organisation you come into contact with during the course of your work for HF Group Ltd, and includes actual and potential customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

## Who is covered by the Policy?

This policy applies to all HF Group Ltd employees at all levels and grades whether permanent, fixed-term or temporary.

## Compliance Officer

The Company has appointed the Group HSEQ Manager Pat Rafferty as Independent Compliance Officer for whom Employees can contact in full confidence should they suspect wrong doing as described within this Policy Document. (Contact 07789 395787) [pat.rafferty@hf-group.co.uk](mailto:pat.rafferty@hf-group.co.uk))

| Status   | Name          | Position           | Signature | Date       |
|----------|---------------|--------------------|-----------|------------|
| Approved | Pat Rafferty  | Compliance Officer |           | 01/04/2023 |
| Approved | Hugh R Fulton | Group MD           |           | 01/04/2023 |

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Manchester 0161 406 8233

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Aberdeen 01224 690 100

Head Office: 100 Albert Drive, Glasgow, G41 2SJ

[www.hf-group.co.uk](http://www.hf-group.co.uk)

HF Electrical Ltd: SC073414

HF Fire & Security Ltd: SC706104

HF Comms Ltd: SC196409

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## What is Bribery?

A bribe is an inducement or reward offered, promised or provided in order to gain any Commercial, contractual, regulatory or personal advantage.

### Examples of bribery:

#### 1. Offering a bribe

You offer a potential customer ticket to a major sporting event, but only if they agree to do business with HF Group Ltd.

This would be an offence as you are making the offer to gain a commercial and Contractual advantage. HF Group Ltd may also be found to have committed an offence because the offer has been made to obtain business for the business. It may also be an offence for the potential customer to accept your offer.

#### 2. Receiving a bribe

A supplier gives your nephew a job, but makes it clear that in return they expect you to use your influence in HF Group Ltd to ensure the business continues to do business with them. It is an offence for a supplier to make such an offer. It would be an offence for you to accept the offer as you would be doing so to gain a personal advantage.

#### 3. Bribing a public official

You arrange for the business to pay an additional payment to an official to speed up an administrative process.

The offence of bribing a public official has been committed as soon as the offer is made. This is because it is made to gain a business advantage for HF Group Ltd. HF Group Ltd may also be found to have committed an offence.

## What is Not Acceptable?

It is not acceptable for you (or someone on your behalf) to:

1. Give; promise to give, or offer a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given.
2. Give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure.
3. Accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them.
4. Accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return.
5. Threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy.
6. Engage in any activity that might lead to a breach of this policy.

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## Facilitation Payments and Kickbacks

HF Group Ltd does not make, and will not accept, facilitation payments or "kickbacks" of any kind.

Facilitation payments are typically small, unofficial payments made to secure or expedite a routine action.

If you are asked to make a payment on HF Group Ltd. behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided.

If you have any suspicions, concerns or queries regarding a payment, you should raise these with your Line Manager and/or a director or Compliance Officer.

Kickbacks are typically payments made in return for a business favour or advantage. All HF Group Ltd employees must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by you or the business.

## Conflicts of Interest

Conflicts of interest arise when employees find themselves in a position where two or more interests compete, potentially comprising judgement or independence. Usually, the conflict is about individuals benefitting at the expense of the company or another employer.

Very often, perceptions of a conflict of interest can be just as damaging as an actual conflict of interest.

Employees must notify their Line Manager and / or Director / Compliance Officer of any potential and/or actual conflict of interest.

## Your Responsibilities

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for HF Group Ltd or under our control.

HF Group Ltd employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify Your Line Manager and /or a Director / Compliance Officer as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

For example, if a customer or potential customer offers you something to gain a business advantage with us, or indicates to you that a gift or payment is required to secure their business. Further "red flags" that may indicate bribery or corruption are set out in the schedule below.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct.

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## Record-Keeping

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

You must declare and keep a written record of all hospitality or gifts accepted or offered, which will be subject to managerial review.

You must ensure all expense claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with the HF Group Ltd expenses policy and specifically record the reason for the expenditure.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as customers, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

## How to Raise a Concern

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries, these should be raised with your line manager, and/or Director / or Compliance Officer. (Contact 07789 395787, pat.rafferty@hf-group.co.uk)

## Communication

All new employees are to be made aware of this policy as part of their induction process. HF Group Ltd zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

## Who is Responsible for the Policy?

The HF Group Ltd board of directors has overall responsibility for ensuring this policy complies with its legal and ethical obligations, and that all those under its control comply with it.

The Group Operations Director is responsible for implementing this policy and dealing with any queries on its interpretation. Management at all levels are responsible for ensuring those reporting to them is made aware of and understand this policy.

## Monitoring and Review

The Group Operations Director will monitor the implementation of this policy and audits will be used to provide assurance that it is effective in countering bribery and corruption.

A list of potential risk scenarios "Red flags" is provided in the following schedule to assist HF Group Ltd employees with making the right decisions.

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## POTENTIAL RISK SCENARIOS: "RED FLAGS"

The following is a list of possible red flags that may arise during the course of you working for HF Group Ltd and which may raise concerns under various anti-bribery and anti-corruption laws. The list is not intended to be exhaustive and is for illustrative purposes only.

If you encounter any of these red flags while working for HF Group Ltd, you must report them promptly to your Line Manager and Or Director.

1. You become aware that a third party engages in, or has been accused of engaging in, improper business practices;
2. You learn that a third party has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a "special relationship" with government officials;
3. A third party insists on receiving a commission or fee payment before committing to sign up to a contract with HF Group Ltd or carrying out a government function or process for the business;
4. A third-party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made;
5. A third party requests that payment is made to a country or geographic location different from where the third party resides or conducts business;
6. A third party requests an unexpected additional fee or commission to "facilitate" a service;
7. A third party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services;
8. A third party requests that a payment is made to "overlook" potential legal violations;
9. a third party requests that you provide employment or some other advantage to a friend or relative;
10. You receive an invoice from a third party that appears to be non-standard or customised;
11. A third party insists on the use of side letters or refuses to put terms agreed in writing;
12. You notice that HF Group Ltd has been invoiced for a commission or fee payment that appears large given the service stated to have been provided;
13. A third party requests or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to us;
14. You are offered an unusually generous gift or offered lavish hospitality by a third party

### What is acceptable?

The government does not intend that genuine Hospitality or similar business expenditures that are reasonable and proportionate be caught by the Act.

HF group Ltd can continue to provide bona fide hospitality and promotional or other expenditure which seeks to improve the image of HF Group Ltd. Any Corporate hospitality expenditure must be approved by an HF company director.

**Hospitality, to a maximum value of £100 is acceptable, provided it is reasonable in the circumstances offered.**

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