

Bribery & Corruption Policy

Future Garments Ltd t/a Eurox

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1. Policy Statement

1.1. Future Garments Limited t/a Eurox is committed to conducting all business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are dedicated to acting professionally, fairly, and with integrity in all our business dealings and relationships wherever we operate. We are committed to implementing and enforcing effective systems to counter bribery.

1.2. Future Garments Limited t/a Eurox will uphold all relevant laws to counter bribery and corruption, including the UK Bribery Act 2010, applicable both domestically and internationally.

1.3. The purpose of this policy is to define our responsibilities, and those of anyone working for us, in observing and upholding our stance on bribery and corruption. It also provides guidance on how to recognise and manage bribery and corruption issues.

1.4. We have identified certain activities that pose increased risks, including:

Overseas collaborations, joint ventures, and partnerships (whether formal or informal).

Receipt of gifts and donations.

Grant funding and public procurement, particularly in construction-related activities.

1.5. To mitigate these risks, we have implemented the following measures:

An anti-bribery and corruption policy.

1.6. For the purposes of this policy, third party refers to any individual or organisation encountered during the course of your work, including actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisors, and officials.

2. Who is covered by the Policy?

2.1. 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, trainees, casual workers, agency staff, or any other person associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as "workers").

3. What is Bribery?

3.1. A bribe is an inducement or reward offered, promised, or provided to gain any commercial, contractual, regulatory, or personal advantage.

3.2. Examples of offering a bribe:

3.2.1. Offering a potential business partner tickets to a major sporting event in exchange for agreeing to do business with us. This constitutes an offence as it seeks to gain a commercial and contractual advantage.

3.3. Examples of receiving a bribe:



3.3.1. A supplier offers your relative a job with the expectation that you will use your influence to ensure we continue to do business with them. This is an offence for both the supplier and the employee accepting the offer.

4. Hospitality and Gifts

4.1. This policy does not prohibit normal and appropriate hospitality (given and received) or the giving or receipt of gifts.

4.2. Normal and appropriate hospitality and gifts are characterised by:

4.2.1. Not being made with the intention of influencing a third party to obtain or retain business.

4.2.2. Being given in our name, not in your name.

4.2.3. Being of an appropriate type and value considering the reason for the gift, and given openly, not secretly.

5. What is Unacceptable?

5.1. It is unacceptable for you (or someone on your behalf) to:

5.1.1. Give, promise, or offer payment, gifts, or hospitality with the expectation that a business advantage will be received, or to reward a business advantage already given.

5.1.2. Accept payment from a third party that you suspect or know is offered with the expectation of obtaining a business advantage.

5.1.3. Accept a gift or hospitality from a third party if you know or suspect it is offered with the expectation of a business advantage in return.

5.1.4. Engage in any activity that might lead to a breach of this policy.

6. Your Responsibilities

6.1. You must read, understand, and comply with this policy.

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

6.3. You must notify your manager and/or the Compliance Manager as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

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

7. Record Keeping

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

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



7.3. All accounts, invoices, and other documents and records relating to dealings with third parties should be prepared and maintained with strict accuracy and completeness.

8. How to Raise A Concern

8.1. 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 the Compliance Manager.

9. What to Do If You Are A Victim of Bribery or Corruption

9.1. It is important that you inform the Compliance Manager as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

10. Protection

10.1. Workers who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, may worry about repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

11. Review and Monitoring

11.1. This policy will be reviewed regularly to ensure it remains compliant with relevant laws and effective in addressing the risks associated with bribery and corruption.

11.2. The Senior Management Team will monitor the implementation of this policy and review its effectiveness annually or as necessary in response to significant changes in the business or regulatory environment.

12. Who Is Responsible for The Policy

12.1. The Senior Management Team has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Signed:



Kuldip Palak

Managing Director

Date: 31/07/2024

