



1. Policy

SwiftPath Logistics rejects bribery in all forms. No employee, contractor, consultant, or associated person may offer, give, receive, or accept a bribe in any circumstance where there is a risk of bribery.

2. Meaning of Bribery

Bribery includes giving or receiving any financial or other advantage to influence a person to perform a duty improperly or to gain a business advantage. This applies whether the advantage benefits the company or a third party.

3. Business Entertaining

Reasonable business entertaining, such as meals, is generally permitted. Employees must ensure that:

- Expense claims are transparent and explain the relationship with the parties entertained.
- Entertaining does not exceed normal limits (e.g., £50 per person plus VAT without prior approval).
- Any entertainment that could be construed as bribery must be avoided or approved in advance by management.

4. Reporting of Hospitality and Gifts

All hospitality or gifts exceeding £100 must be reported to management.

5. Policy Breaches

Any breach of this policy may result in disciplinary action, including summary dismissal, depending on severity.

6. Whistleblowing and Guidance

Employees are encouraged to report any suspected bribery confidentially. Anyone approached with a bribe should refuse and immediately inform management.