

Mechanical Removals & Installations Ltd
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PLANT & MACHINERY MOVEMENT / CRANAGE CONTRACT LIFTING / TRANSPORT / STORAGE

Document title	Anti-Bribery and Corruption Policy
Company	Mechanical Removals & Installations Ltd ("MRI Ltd")
Document owner	Managing Director
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Approved by	Mark Collier Snr, Managing Director
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Next review date	21/06/2026

ANTI-BRIBERY AND CORRUPTION POLICY

Mechanical Removals & Installations Ltd ("MRI Ltd")

1. Purpose

This policy sets out Mechanical Removals & Installations Ltd ("MRI Ltd") commitment to conducting all business activities with integrity, honesty and transparency.

As a specialist contractor delivering lifting, transport and installation services, MRI Ltd operates in environments where commercial decisions, supplier relationships and project delivery must be managed responsibly. This policy explains the standards and controls used to prevent bribery and corruption across all operations.

MRI Ltd operates a **zero-tolerance** approach to bribery and corruption and is committed to complying with all applicable anti-corruption laws, including the **UK Bribery Act 2010**.

2. Scope

This policy applies to all persons working for or on behalf of MRI Ltd in any capacity, including:

- Employees and management personnel
- Contractors and subcontractors
- Suppliers and service providers
- Any third party acting on behalf of MRI Ltd

It applies across all business activities, including:



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- Mechanical & electrical removals and installations
- AP-led lifting operations and lift planning
- Plant movement and specialist handling
- Transport and heavy haulage activities
- Fabrication and associated works
- Storage and logistics services

3. Responsibilities

Responsibility for preventing bribery and corruption is allocated as follows:

- **Managing Director**
Overall accountability for ethical conduct, compliance and implementation of this policy
- **Management Team**
Responsible for ensuring appropriate controls are in place and that business activities are conducted in line with this policy
- **Supervisors & Operational Leads**
Responsible for maintaining ethical conduct on projects and reporting any concerns
- **Employees and Operatives**
Responsible for complying with this policy and reporting any suspected wrongdoing
- **Supply Chain & Third Parties**
Expected to operate in accordance with MRI Ltd's ethical standards and legal obligations

4. Policy Statement and Commitments

MRI Ltd is committed to preventing bribery and corruption in all of its activities. We will act professionally, fairly and with integrity in all business dealings and relationships and implement and maintain effective systems and controls to counter bribery and corruption.

4.1 Zero-tolerance approach

- Not offering, giving, requesting or accepting bribes or improper payments under any circumstances
- Rejecting any form of inducement intended to influence business decisions

4.2 Ethical business conduct

- Conducting all business activities in a fair, honest and professional manner
- Ensuring that decisions are based on merit, value and compliance
- Maintaining integrity across all client, supplier and commercial relationships



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4.3 Transparency and financial controls

- Ensuring all payments, transactions and expenses are properly recorded and authorised
- Maintaining accurate financial records in line with legal requirements
- Preventing hidden or unrecorded transactions

4.4 Conflicts of interest

- Identifying and declaring any actual or potential conflicts of interest
- Ensuring that personal interests do not influence business decisions

4.5 Supply chain integrity

- Working only with clients, suppliers and partners who operate ethically
- Avoiding engagement with organisations or individuals involved in unethical practices
- Promoting responsible and transparent conduct across the supply chain

4.6 Reporting and investigation

- Providing clear channels for reporting suspected bribery or unethical conduct
- Investigating all concerns promptly, fairly and confidentially
- Taking appropriate action where breaches are identified

4.7 Legal compliance

MRI Ltd will:

- Comply fully with the **UK Bribery Act 2010**
- Maintain appropriate controls to prevent bribery and corruption
- Ensure ethical standards are embedded across all operations
- Integrate anti-bribery controls into wider business processes and decision-making

5. Definitions

- **Bribery:** offering, promising, giving, requesting or accepting any financial or other advantage to induce or reward improper performance of a function or activity.
- **Corruption:** the abuse of entrusted power for private gain and includes bribery, facilitation payments, fraud and other dishonest conduct.
- **Associated person:** any person or organisation performing services for or on behalf of MRI Ltd (including employees, agency staff, contractors, subcontractors, consultants and suppliers where relevant).



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6. Prohibited conduct

- You must not offer, promise, give, request or accept a bribe in any form.
- You must not make or accept **facilitation payments** (typically small payments to secure or speed up routine actions).
- You must not offer or accept gifts, hospitality or expenses that could be perceived as intended to influence a business decision.
- You must not bribe a public official (directly or indirectly) and must take extra care when dealing with public bodies, inspectors or regulatory agencies.
- You must not threaten, retaliate against or disadvantage anyone who raises a genuine concern in good faith.

7. Gifts, hospitality and expenses

Reasonable and proportionate hospitality and promotional expenditure can play a legitimate role in building business relationships. However, gifts and hospitality must never be offered or accepted if they could reasonably be viewed as an attempt to obtain or retain business, secure an improper advantage, or influence a decision.

- Gifts and hospitality must be lawful, infrequent, appropriate to the business context and in line with local custom.
- Cash, cash equivalents (e.g., vouchers) and personal gifts are prohibited.
- Where practical, hospitality should be pre-approved by a member of the Management Team.
- All gifts and hospitality given or received must be recorded in company records in accordance with our financial controls.

8. Political and charitable contributions

MRI Ltd does not make political donations. Charitable donations and sponsorship may be made only where they are lawful, properly documented, and approved in advance by the Managing Director. Donations must never be used as a substitute for, or a means of concealing, bribery.

9. Due diligence and third parties

MRI Ltd will take a risk-based approach to due diligence on third parties (including suppliers, subcontractors, consultants and agents) and will take steps to ensure they understand and comply with this policy.

- We may carry out proportionate checks before engaging third parties, particularly for higher-risk activities.
- Contracts may include anti-bribery obligations and audit/termination rights where appropriate.
- Employees must report any red flags (e.g., unusual payment requests, refusal to provide information, or requests for payments to third parties or offshore accounts).

10. Training and communication

MRI Ltd will communicate this policy to employees and relevant third parties and will provide training proportionate to role and risk. All employees must understand the standards required and how to raise concerns.



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11. Record-keeping

MRI Ltd must keep accurate and complete financial records and have appropriate internal controls to evidence business reasons for payments and transactions. No unrecorded or "off-book" accounts are permitted. Supporting documentation must be retained in line with company and legal requirements.

12. Breaches of this policy

A breach of this policy may result in disciplinary action up to and including dismissal for employees, and termination of contract for contractors, subcontractors or other third parties. Where appropriate, MRI Ltd may also report matters to relevant authorities.

13. Operational approach

MRI Ltd maintains a structured approach to preventing bribery and corruption through:

- Clear internal policies and expectations
- Strong leadership and accountability from senior management
- Communication of ethical standards across all levels of the organisation
- Monitoring of business practices, procurement and financial activities
- Review of ethical conduct during management reviews and SHEQ processes

14. Continuous improvement

MRI Ltd is committed to continuous improvement by:

- Reviewing ethical practices and controls regularly
- Monitoring compliance and identifying areas for improvement
- Strengthening procedures where risks are identified
- Ensuring alignment with legal requirements and industry expectations

15. Review

This policy will be:

- **Reviewed regularly and at least annually** to ensure continued relevance and effectiveness
- Updated in line with changes to legislation, business activities and industry best practice

Next Review Date: 21/06/2026



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16. Approval

Approved by:

Mark Collier Snr
 Managing Director
 Mechanical Removals & Installations Ltd

17. Contact and reporting concerns

For further information or to report a concern:

Email: enquiries@mri-online.co.uk

Telephone: 01474 354500

