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Anti-Corruption Policy

Anti-Corruption Statement

At Pylon One, we are committed to conducting our business with the highest standards of integrity, transparency, and accountability. Corruption undermines trust, fairness, and economic development, and we have a zero-tolerance approach to all forms of bribery and corruption. This Anti-Corruption Policy outlines our commitment to ethical practices and provides guidance to ensure compliance with anti-corruption laws and regulations.



John Houchin

Director

22.01.2025



Mark Lyons

Director

22.01.2025

Document History

Sign off:

Name	Designation	Date
John Houchin	Director	22/01/2025
Mark Lyons	Director	22/01/2025
Alex Stidston	Facilities Manager	22/01/2025

Status: APPROVED

The issue status of this document is indicated by the issue number and date detailed below. When any part of this document is amended, issue numbers, dates and a record of the changes is recorded here.

Issue	Amendment	Date	Name	Designate
1.0	Incipient version	31/10/2023	AS	FM
2.0	Updates	08/03/2024	AS	FM
3.0	Updates	24/01/2025	AS	FM

Introduction

The purpose of this policy is to set clear standards and expectations regarding the prevention of corruption and bribery in all aspects of Pylon One's operations. It serves to protect our reputation, ensure legal compliance, and promote ethical conduct.

Scope

This policy applies to all employees, directors, contractors, consultants, suppliers, and any other parties working on behalf of Pylon One, regardless of their location.

Principles

Zero Tolerance

Pylon One has zero tolerance for bribery and corruption. All forms of corruption, including bribery, facilitation payments, and kickbacks, are strictly prohibited.

Compliance with Laws

We comply with all applicable anti-corruption laws and regulations, including the UK Bribery Act 2010.

Ethical Conduct

We are committed to acting with integrity and honesty in all business dealings, fostering a culture of accountability and transparency.

Definitions

Bribery

The offering, giving, receiving, or soliciting of anything of value to influence the actions of an individual in a position of trust.

Facilitation Payments

Small, unofficial payments made to expedite routine governmental actions. These are prohibited under this policy.

Gifts and Hospitality

Tokens of appreciation or entertainment offered or received in the course of business. These must be reasonable, transparent, and not intended to influence business decisions.

Responsibilities

Employees

- Avoid engaging in any form of bribery or corrupt practices.
- Report any suspicions of corruption or unethical conduct.
- Complete mandatory training on anti-corruption policies and practices.

Management

- Lead by example in demonstrating ethical behaviour.
- Ensure that anti-corruption measures are effectively implemented and monitored.
- Provide guidance and resources to employees to support compliance.

Third Parties

- Suppliers, contractors, and other third parties must adhere to Pylon One's anti-corruption standards as outlined in this policy and the Supplier Code of Conduct.

Policy Guidelines

Gifts and Hospitality

All gifts and hospitality offered or received must be:

- Reasonable and proportionate
- Recorded transparently in the Gifts and Hospitality Register
- Approved in accordance with internal procedures

Conflicts of Interest

Employees must avoid situations where personal interests conflict with their duties to Pylon One. Any potential conflicts must be disclosed immediately.

Donations and Sponsorships

Charitable donations and sponsorships must be transparent, properly documented, and not intended to secure improper advantages.

Political Contributions

Pylon One does not make political donations. Employees acting in a personal capacity must ensure their activities do not create a conflict of interest.

Facilitation Payments

Facilitation payments are strictly prohibited under this policy, regardless of local customs or practices.

Reporting and Whistleblowing

Reporting Concerns

Employees and third parties are encouraged to report any suspected instances of corruption or unethical behaviour. Reports can be made confidentially through Pylon One's whistleblowing mechanism.

Protection for Whistleblowers

Individuals who report concerns in good faith will be protected from retaliation or adverse consequences.

Monitoring and Compliance

Internal Audits

Regular audits will be conducted to ensure compliance with this policy.

Training

All employees must complete mandatory anti-corruption training as part of their onboarding and ongoing development.

Non-Compliance

Violations of this policy may result in disciplinary action, up to and including termination of employment or contracts.

Review and Updates

This policy will be reviewed annually to ensure its continued relevance and effectiveness in combating corruption.

For questions or further guidance on this policy, please contact the Senior Management team via pylon@pylonone.com.