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## **Anti-Bribery Policy 2024**

PAI Group of Companies (including PAI Holdings Ltd., PAI, Vaughan Sound Installations Ltd., and Lighting Integration Ltd.) Anti-Bribery Policy: covering the giving and acceptance of bribes.

### **1. Introduction**

PAI Group values its reputation for ethical behaviour and for financial probity and reliability. It recognises that over and above the commission of any crime, any involvement in bribery will also reflect adversely on its image and reputation. Its aim therefore is to limit its exposure to bribery by:

- Setting out a clear anti-bribery policy;
- Ensuring that all employees can recognise and avoid the use of bribery by themselves and others;
- Encouraging its employees to be vigilant and to report any suspicion of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately;
- Rigorously investigating instances of alleged bribery and assisting the police and other appropriate authorities in any resultant prosecution;
- Taking firm and vigorous action against any individual(s) involved in bribery.

### **2. The Policy**

*PAI Group prohibits:*

The offering, the giving, the solicitation or the acceptance of any bribe, whether cash or other inducement

*To or from:*

Any person or company, wherever they are situated and whether they are a public official or body or private person or company

*By:*

Any individual employee, agent or other person or body acting on PAI Group's (or member company) behalf.

*In order to:*

Gain any commercial, contractual or regulatory advantage for the PAI Group's (or member company) in a way which is unethical

*Or in order to:*

Gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.



### 3. Further Clarification

This policy prohibits any inducement which results in a personal gain or advantage to the recipient or any person or body associated with them, and which is intended to influence them to take action which may not be solely in the interests of the Group or of the person or body employing them or whom they represent.

This policy is not meant to prohibit the following practices providing they are customary in a particular market, are proportionate and are properly recorded:

- Normal and appropriate hospitality
- The giving of a ceremonial gift on a festival or at another special time
- The sponsoring of (the Members Organisation) social and business events, as is common practice.

Inevitably, decisions as to what is acceptable may not always be easy. If anyone is in doubt as to whether a potential act constitutes bribery, the matter should be referred to the Commercial Director before proceeding.

### 4. Employee Responsibility

The prevention, detection and reporting of bribery is the responsibility of all employees throughout the PAI Group (or member company). Suitable channels of communication by which employees or others can report confidentially any suspicion of bribery will be maintained in accordance with company policy on Reporting Malpractice.

### 5. Policy Review

This Policy and its associated documentation will be reviewed after changes in legislation, changes in the structure of the Company, in the light of additional knowledge or information becoming available, and in any event annually.



Name Paul Adams  
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Date: 4<sup>th</sup> January 2024



Name Richard Vaughan  
Position Director, The PAI Group of Companies, PAI, Vaughan Sound Installations Ltd, PAI Holdings Ltd.

Date: 4<sup>th</sup> January 2024

