

Anti Bribery and Corruption Policy

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1. Main purpose of this policy

This anti-bribery policy exists to set out the responsibilities of the Company and those who work for us in regards to observing and upholding our zero-tolerance position on bribery and corruption.

It also exists to act as a source of information and guidance for those working for our Company. It helps them recognise and deal with bribery and corruption issues, as well as understand their responsibilities.

2. Policy statement

Our Company is committed to conducting business in an ethical and honest manner and is committed to implementing and enforcing system and procedures that ensure bribery is prevented. Our Company has zero-tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly and with integrity in all business dealings.

The Company is committed to continually upholding all laws relating to anti-bribery and corruption in all the jurisdictions in which we operate. We are bound by the laws of the UK, including the Bribery Act 2010 in regards to our conduct both at home and abroad.

If our company is discovered to have taken part in corrupt activities, we may be subjected to an unlimited fine and face serious damage to our reputation. It is with this in mind that we commit to preventing bribery and corruption in our business and take our legal responsibilities seriously.

3. Who is covered by the policy?

The anti-bribery policy applies to all employees (whether temporary, fixed-term, or permanent), consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, sponsors or any other person or persons associated with us (including third parties), or any of our subsidiaries or their employees, no matter where they are located.

In the context of this policy, third-party refers to any individual or organisation our company meets and works with. It refers to actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers and government and public bodies.

Any arrangements our Company makes with a third party is subject to clear contractual terms, including specific provisions that require the third party to comply with standards and procedures relating to anti-bribery and corruption.

4. Definition of bribery

Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, soliciting something of value or of an advantage so to induce or influence an action or a decision.

A bribe refers to any inducement, reward, or object/item of value offered to another individual in order to gain commercial, contractual, regulatory or personal advantage.

Bribery is not limited to the act of offering a bribe. If an individual is offered a bribe and they accept it, they are also breaking the law.

Bribery is illegal, employees must not engage in any form of bribery, whether it be directly, passively (as described above) or through a third party (such as an agent or distributor). They must not accept bribes in any degree and if they are uncertain about whether something is a bribe or a gift or act of hospitality they must inform and seek further advice from their line manager.

5. Gifts and hospitality

The Company may accept appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts meets the following requirements:

- It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of business or a business advantage, or as an explicit or implicit exchange for favours or benefits;

- It is not made with the suggestion that a return favour is expected;
- It is in compliance with law;
- It is given in the name of the company, not in an individual's name;
- It does not include cash or a cash equivalent (e.g. a voucher or gift certificate);
- It is appropriate for the circumstances (e.g. giving small gifts around Christmas or as a small thank you to a company for helping with a large project upon completion);
- It is of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift;
- It is given/received openly, not secretly;
- It is not selectively given to a key influential person, clearly with the intention of directly influencing them;
- It is not above a certain excessive value which is usually in excess of £30.

As good practice, gifts given and received should always be disclosed to your line manager. Gifts from suppliers should always be disclosed and recorded.

The intention behind a gift being given/received should always be considered. If there is any uncertainty, the advice of your line manager should be sought.

6. Charitable contributions

The Company accepts and indeed encourages the act of donating to charities whether through services, knowledge, time, or direct financial contributions (cash or otherwise) and agrees to disclose all charitable contributions it makes. Employees must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery.

We will ensure that all charitable donations made are legal and ethical and that donations are not offered or made without the approval of a Director.

7. Employee responsibilities

As an employee, you must ensure that you read, understand and comply with the information contained within this policy and with any training or other anti-bribery and corruption information you are given.

All employees and those under our control are equally responsible for the prevention, detection and reporting of bribery and other forms of corruption. You are required to avoid any activities that could lead to or imply a breach of this anti-bribery policy.

If you have reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, you must notify your line manager immediately.

If any employee breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct.

8. What happens if I need to raise a concern?

This section of the policy covers 3 areas:

- How to raise a concern;
- What to do if you are a victim of bribery or corruption;
- Protection.

How to raise a concern

If you suspect there is an instance of bribery or corrupt activities occurring, you should raise your concerns immediately. If you are uncertain about whether a certain action or behaviour can be considered bribery or corruption, you should speak to your manager.

What to do if you are a victim of bribery or corruption

You must tell your manager as soon as possible if you are offered a bribe by anyone, if you are asked to make one, if you suspect that you may be bribed or asked to make a bribe in the near future or if you have reason to believe that you are a victim of another corrupt activity.

Protection

If you refuse to accept or offer a bribe or you report a concern relating to potential act(s) of bribery or corruption, the Company understands that you may feel worried about potential repercussions.

The Company will support anyone who raises concerns in good faith under this policy, even if investigation finds that they were mistaken. We will ensure that no one suffers any detrimental treatment as a result of refusing to accept or offer a bribe or other corrupt activities or because they reported a concern relating to potential act(s) of bribery or corruption.

If you have reason to believe you have been subjected to unjust treatment as a result of a concern or refusal to accept a bribe, you should inform your line manager immediately.

9. Communication

Our anti-bribery and corruption policy and zero-tolerance attitude will be clearly communicated to all suppliers, contractors, business partners and any third-parties at the outset of business relations and thereafter by posting on our website.

10. Record keeping

The Company will keep detailed and accurate financial records and will have appropriate internal controls in place to act as evidence for all payments made. The Company will declare and keep a written record of the amount and reason for hospitality or gifts accepted and given, and understand that gifts and acts of hospitality are subject to managerial review.

11. Monitoring and reviewing

Julie Breakwell is responsible for monitoring the effectiveness of this policy and will review the implementation of it on a regular basis. He or she will assess its suitability, adequacy and effectiveness.

Internal control systems and procedures designed to prevent bribery and corruption are subject to regular audits to ensure that they are effective in practice. Any need for improvements will be applied as soon as possible.

This policy does not form part of an employee's contract of employment and may be amended at any time to improve its effectiveness at combatting bribery and corruption.