

Number	Title	Owner	Last Updated	Next Review Date
-	Anti-Corruption and Bribery Policy	CEO	Dec 2021	Nov 2023

ANTI-CORRUPTION AND BRIBERY POLICY

- a. It is our policy and our duty to conduct all our business in an honest, ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate - implementing and enforcing effective systems to counter bribery and corruption.
- b. We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. However, we remain bound by UK laws, including the Bribery Act 2010, in respect of our conduct both at home and abroad.

About this policy

- c. The purpose of this policy is to:
 1. set out our responsibilities, and of those working for us, in observing and upholding our position on bribery and corruption; and
 2. provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues.
- d. It is a criminal offence to offer, promise, give, request, or accept a bribe. Individuals found guilty can be punished by up to ten years' imprisonment and/or a fine. As an employer if we fail to prevent bribery we can face an unlimited fine, exclusion from tendering for public contracts, and damage to our reputation. We take our legal responsibilities very seriously.
- e. In this policy, third party means any individual or organisation you come into contact with during the course of your work for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

What are bribery and corruption?

- f. **Bribery** is offering, promising, giving or accepting any financial or other advantage, to induce the recipient or any other person to act improperly in the performance of their functions, or to reward them for acting improperly, or where the recipient would act improperly by accepting the advantage.
- g. An **advantage** includes money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or anything else of value.
- h. A person **acts improperly** where they act illegally, unethically, or contrary to an expectation of good faith or impartiality, or where they abuse a position of trust. The improper acts may be in relation to any business or professional activities, public functions, acts in the course of employment, or other activities by or on behalf of any organisation of any kind.
- i. **Corruption** is the abuse of entrusted power or position for private gain.

What you must not do

- j. It is not acceptable for you (or someone on your behalf) to:
 - 1. give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
 - 2. give or accept a gift or hospitality during any commercial negotiations or tender process, if this could be perceived as intended or likely to influence the outcome;
 - 3. accept a payment, gift or hospitality from a third party that you know or suspect is offered with the expectation that it we will provide a business advantage for them or anyone else in return;
 - 4. accept hospitality from a third party that is unduly lavish or extravagant under the circumstances;
 - 5. offer or accept a gift to or from government officials or representatives, or politicians or political parties, without the prior approval of your Manager or the CEO;
 - 6. threaten or retaliate against another individual who has refused to commit a bribery offence or who has raised concerns under this policy; or
 - 7. engage in any other activity that might lead to a breach of this policy.

Facilitation payments and kickbacks

- k. We do not make, and will not accept, facilitation payments or "kickbacks" of any kind.
- l. **Facilitation payments**, also known as "back-handers" are typically small, unofficial payments made to secure or expedite a routine or necessary action (for example by a government official). They are not common in the UK, but are in some other jurisdictions where we might operate from time to time. **Kickbacks** are typically payments made in return for a business favour or advantage.
- m. Avoid any activity that might lead to a facilitation payment or kickback being made or accepted by us or on our behalf, or that might suggest that such a payment will be made or accepted. If you are asked to make a payment on our behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt which details the reason for the payment. If you have any suspicions, concerns or queries regarding a payment, you should raise these with your manager, or the CEO.

Gifts, hospitality and expenses

- n. We allow reasonable and appropriate hospitality or entertainment given to or received from third parties, for the purposes of:
 - 1. establishing or maintaining good business relationships;
 - 2. improving or maintaining our reputation.
- o. The giving and accepting of gifts is allowed if the following requirements are met:
 - 1. it is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
 - 2. it is given in our name, not in your name;
 - 3. it does not include cash or a cash equivalent (such as gift certificates or vouchers);
 - 4. it is appropriate in the circumstances, taking account of the reason for the gift, its timing and value. For example, in the UK it is customary for small gifts to be given at Christmas; and
 - 5. it is given openly, not secretly;
 - 6. it complies with any applicable local law.

Record-keeping

- p. We must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.
- q. You must declare and keep a written record of all hospitality or gifts given or received, which will be subject to review.
- r. You must submit all expenses claims relating to hospitality, gifts or payments to third parties in accordance with our expenses policy and record the reason for expenditure.

Your responsibilities

- s. The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- t. You must notify your Manager or the CEO as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur. For example, if a client or potential client offers you something to gain a business advantage with us, or indicates to you that a gift or payment is required to secure their business.

Breaches of this policy

- u. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.