



Anti-Bribery Policy 2020

Anti-Bribery Policy

Purpose

We are committed to implementing and enforcing effective systems to counter bribery. Therefore, it is always our policy to conduct all aspects of our business in an honest and ethical manner.

This policy applies to all employees and the aim of this policy is to ensure we act in accordance with the Bribery Act 2010, maintain the highest possible standards of business practice and advise all employees, customers and suppliers of our 'zero-tolerance' to bribery.

Under UK law (*UK Bribery Act 2010*), bribery and corruption is punishable by up to ten years imprisonment. If the company is found to have taken part in the corruption, or lacks adequate procedures to prevent Bribery, we could face an unlimited fine and be excluded from tendering for Government contracts.

Definitions

Bribe is a financial or other advantage offered or given to anyone to persuade them to or reward them for performing their duties improperly, or, with the intention of influencing them in the performance of their duties.

Hospitality is the practice of being hospitable, this includes the reception and entertainment of guests/visitors.

Kickbacks or facilitation payments are typically small payments made in return for a business favour or advantage.

Aims

The Company will not:

- Make contributions of any kind with the purpose of gaining any commercial advantage.
- Provide gifts or hospitality with the intention of persuading anyone to act improperly, or to influence a public official in the performance of their duties.
- Make, or accept, "kickbacks" of any kind.

The Company will:

- Maintain appropriate internal records that will evidence the business reason for making any payments to third parties.
- Encourage employees to raise concerns about any issue or suspicion of malpractice at the earliest possible stage.
- Ensure that anyone raising a concern about bribery does not suffer any detriment as a consequence, if you have acted in good faith, even if you have been mistaken.

You must not:

- Accept any financial or other reward from any person(s) in return for providing some favour.
- Request a financial or other reward from any person(s) in return for providing some favour.
- Offer any financial or other reward from any person(s) in return for providing some favour.

Non Compliance

Failure to observe this policy may lead to disciplinary action being taken in accordance with the Company's Disciplinary Policy.

In the event of a breach of the policy by other organisations and/or individuals, the Company will take appropriate action.

Monitoring Policy

The policy will be monitored on an on-going basis to ensure that it addresses issues effectively and assesses how effective we have been in establishing control of our obligations, specifically the following will be monitored:

- Ensuring that all employees working for the Company are advised of the policy.
- Assessment of any reported incident or related occurrence.

More information can be found at:

<https://www.legislation.gov.uk/ukpga/2010/23/data.pdf>