Anti-corruption and bribery policy

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Anti-corruption and bribery policy

1 Policy statement

1.1 It is our policy to conduct all our business in an honest and 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.

1.2 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. Any non-employee who breaches this policy may have their contract terminated with immediate effect.

1.3 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

2 What is bribery?

2.1 **Bribe** means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit.

2.2 **Bribery** includes offering, promising, giving, accepting or seeking a bribe.

2.3 Money laundering is a form of corruption which is strictly prohibited and is also covered by this policy

2.4 All forms of bribery are strictly prohibited. If you are unsure about whether a particular act constitutes bribery, raise it with your manager or the Managing Director.

2.5 Specifically, you must not:

2.5.1 give or offer any payment, gift, hospitality or other benefit in the expectation that a business advantage will be received in return, or to reward any business received.

2.5.2 accept any offer from a third party that you know or suspect is made with the expectation that we will provide a business advantage for them or anyone else; or

2.5.3 give or offer any payment (sometimes called a facilitation payment) to a government official in any country to facilitate or speed up a routine or necessary procedure.

2.6 You must not threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.

3 **Gifts and hospitality**

4 Our policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties. The test is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift must always be considered and meets the following requirements:

4.1.1 It is not made with the intention of influencing you to give, obtain or reward business or as explicit or implicit exchange of favours or benefits.

4.1.2 It is not made with the suggestion that a return favour is expected.

4.1.3 It is in compliance with UK and/or local laws.

4.1.4 It is given in the name of the Company not in an individual's name.

4.1.5 It does not include cash or cash equivalent.

4.1.6 It is appropriate for the circumstances e.g. small Christmas gifts.

4.1.7 It is of an appropriate type and value.

4.1.8 It is given and received openly.

4.1.9 It is not selectively given to a key influential person with the intention of directly influencing them.

4.1.10 It is not above £100 and/or be a token (such as diaries, calendars or promotional material).

4.1.11 It is not offered to or accepted from a government official, representative of a political party.

4.2 Therefore, you should only accept gifts of a token nature or of relatively insignificant value and these should be handed to HR or the Charity Committee to be raffled and the proceeds, if any, will be given to our local charities.

4.3 Personal invitations to non-work-related, non-company events involving corporate hospitality offered or given by any customer, visitor, supplier, business contact or potential contractor, must be notified to your manager and only accepted with the approval of a Director.

4.4 There may be some circumstances where hospitality is offered for events which will promote the interests of the company, and we recognise that external networking for some departments is a core part of their work. In these cases, you should be clear in what capacity you would be attending and inform your Manager/Director.

5 Facilitation Payments

5.1 We do not accept and will not make any form of facilitation payment. These are a form of bribery which involves expediating the performance of a public official to speed up a duty or action.

6 Political Donations

6.1 We do not make donations in cash, kind or other means to political parties.

7 Charitable Donations

7.1 We support and encourage donations and support for local charities including services, knowledge, time or financial donations via our Charity Committee. This committee will publicise charity giving, events and publish funds raised on a regular basis via email, intranet or briefings. Anyone interested in raising donations for a charity must contact the charity committee in the first instance to determine if it meets our charity giving criteria to avoid conflicts of interest.

8 Record-keeping

8.1 We keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties. You must declare and keep a written record of all hospitality or gifts accepted or offered. You must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with our expenses policy and specifically record the reason for the expenditure.

9 How to raise a concern

9.1 We encourage you to report any concern or suspicion of malpractice at the earliest possible stage. If you are uncertain whether an action or behaviour can be considered bribery or corruption you should speak to your Manager, Director or Head of HR. If you suspect another employee, contractor or customer of breaching this policy you will be protected from any disadvantage through our Whistleblowing Policy even if any investigation finds you were mistaken.

9.2 We will ensure that you will not suffer any detrimental treatment as a result of refusing to accept a bribe or corrupt act or because you reported a concern about a potential act of bribery or corruption. This includes for example dismissal, disciplinary action, unfavourable treatment etc. if you believe you have been subject to unjust treatment as a result of raising a concern or refusing to accept or give a bribe you should inform your manager or Head of HR immediately.

9.3 This policy will be communicated to our suppliers, contractors or any other party as appropriate.