Anti-Bribery and Corruption Policy

It is our policy to conduct all of 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.

We will uphold all laws relevant to countering bribery and corruption. However, we remain bound by the laws of the UK, including the Bribery Act 2010 in respect of our conduct both at home and abroad.

The purpose of this policy is to:

(a) Set out our responsibilities, and of those working for us, in observing and upholding our position on bribery and corruption;

(b) Provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues.

Bribery and corruption are punishable for individuals by up to ten years' imprisonment and if found to have taken part in corruption we could face an unlimited fine, be excluded from tendering for contracts and face damage to our reputation. We therefore take this matter very seriously.

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.

WHO IS COVERED BY THE POLICY?

This policy applies to all individuals working at all levels, including Directors, consultants, employees (whether permanent, fixed-term or temporary), contractors, trainees and agency staff, volunteers or any other person associated with us, wherever located (hereinafter referred to as workers).

WHAT IS BRIBERY?

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

Examples:

Offering a bribe

You offer a potential client tickets to a major sporting event, but only if they agree to do business with us.

This would be an offence as you are making the offer to gain a commercial and contractual advantage. We may also be found to have committed an offence because the offer has been made to obtain business for us. It may also be an offence for the potential client to accept your offer.

Receiving a bribe:

A Supplier gives your nephew a job but makes it clear that in return they expect you to use your influence in our organisation to ensure we continue to do business with them.

It is an offence for a Supplier to make such an offer. It would be an offence for you to accept the offer as in doing so you would gain a personal advantage.

GIFTS AND HOSPITALITY

This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties.

The giving or receipt of gifts is not prohibited, provided:

(a) 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;

(b) It complies with local law;

(c) It is given in the businesses name, not in your name;

(d) It does not include cash or a cash equivalent (such as gift certificates or vouchers);

(e) It is appropriate in the circumstances. For example, in the UK it is customary for small gifts to be given at Christmas time;

(f) Taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time;

(g) It is given openly, not secretly; and

(h) Gifts should not be offered to, or accepted from, government officials or representatives, or politicians or political parties, without the prior approval of our MD.

Clients may, on occasion, express appreciation with a gift. This policy does not prohibit the receipt of such gifts provided that you are satisfied that they are proportionate and reasonable in the circumstances. Gifts from Suppliers should always be disclosed to our MD.

WHAT IS NOT ACCEPTABLE?

It is not acceptable for you (or someone on your behalf) to:

(a) 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;

(b) Accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them;

(c) Accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return;

(d) Threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy;

(e) Engage in any activity that might lead to a breach of this policy.

FACILITATION PAYMENTS AND KICKBACKS

We do not make, and will not accept, facilitation payments or "kickbacks" of any kind. Facilitation payments are typically small, unofficial payments made to, or by an official to ensure or speed up the performance of routine or necessary functions

Kickbacks are typically payments made in return for a business favour or advantage. All workers must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.

DONATIONS

We do not make contributions to political parties. We only make charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made without the prior approval of our MD.

YOUR RESPONSIBILITIES

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of bribery and other forms of corruption is the responsibility of all those working for us or under our control. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify our MD as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

You must declare and keep a written record of all hospitality or gifts accepted or offered, which will be subject to managerial review.

You must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted, and record the reason for the expenditure.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness.

HOW TO RAISE A CONCERN

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, contact our MD.

WHAT TO DO IF YOU ARE A VICTIM OF BRIBERY OR CORRUPTION

It is important that you tell our MD as soon as possible if you are offered a bribe by a third party, are asked to make one, or suspect that this may happen in the future.

PROTECTION

Workers who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future.

MONITORING AND REVIEW

Our MD will monitor the effectiveness and review the implementation of this policy regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible.

All workers are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.