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ANTI BRIBERY POLICY

What is “bribery”?

“Bribery” is giving someone a financial or other advantage to act **improperly** or to reward someone for doing so. For example: an executive making a personal payment to a senior government official in exchange to secure lucrative contracts.

There are two elements to bribery:

- A benefit of some kind being offered, **coupled with**
- The person receiving the benefit then acting in a wrongful manner (or at least the person making the bribe intending for a person to act improperly)

What is not “bribery”?

It is **not** bribery for a business to organise events or provide hospitality in order to market its services or to get to know its clients better.

What is the purpose of the UK Bribery Act 2010 (the “Act”) and what are the main points?

- The Act makes it illegal either to offer or give a bribe or to request or receive a bribe.
- The Act also deals with specific cases such as the bribery of foreign officials and also bribery by agents acting on a company’s behalf.
- The Act also extends to overseas activities of UK entities where the overseas bribery has a direct benefit to a connected UK entity.
- Any actions taking place prior to the 1st July 2011, when the Act came into force, are **not** covered.
- There are significant criminal penalties for breach the Act – although these are mainly aimed at the individuals directly involved - corporate entities can be liable also where a very senior person is involved in the offence or the company fails to prevent the bribery by not having adequate prevention procedures in place.

What is the Company policy in response to the Act?

This communication is part of our procedures to make you aware of provisions of the Act and the Director’s expectation in terms of your conduct.

1. The Company already requires high standards of probity and ethics. The Company is fully committed to carrying out business fairly, honestly and openly. Bribery does not fit with this principle and has never been, and never will be, tolerated in the Company. Persons found being involved in practices which amount to bribery will be subject to disciplinary action which may led to dismissal for gross misconduct. The Company expects compliance in both letter and spirit of the Act and this policy.
2. It is important not only to ensure that bribery does not take place but also ensure that our actions are perceived to be compliant. For this reason, the Company has set approvals and maximum levels for entertainment, expenses, gifts and sponsorships and donations.
 - **Client Entertainment** - All large Client entertainment event invitation lists must be reviewed in advance and approved by the Board of Directors. Where any event spend is likely to exceed £250 this must be approved first. The purpose of such entertainment is to market our services and spend

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time with clients in a more informal setting. Entertainment must **not** be used as a way to influence clients to make improper decisions. You must not make statements or act in a manner which could be perceived as doing so.

- **Expenses and Welfare** – The Employees direct line Manager will be responsible for signing off all expense claims. Larger expense claims over this amount will require the approval of the Board of Directors.
 - **Gifts and Hospitality Which You May Receive** – All client gifts or hospitality which agreed an individual value per person of £100 must be approved by the Board of Directors. It is important that any gifts and/or hospitality do not influence any decision which you may have to make.
 - **Sponsorships and Charitable Donations** – Sponsorships must only be made under written sponsorship agreements which must be approved by the Board of Directors.
3. The Company will provide training to the relevant members of the business if requested. We will also include an introduction to the Act within induction process.
 4. This policy will be available of the public drive of the company network.
 5. If you wish to discuss any issues around the Act or wish to report any activity that you believe may violate the Act or our policy, you should contact a Director. Your query will be treated in confidence and shared only with other Directors.

What may our clients do?

- Each company will have its own policy regarding the Act. You may find that larger clients will have very extensive and comprehensive policies. Smaller clients may have something much simpler. This is because the guidance states that a company’s response need only be proportionate to the potential risks that they face. You should not be surprised if some clients impose limitations on hospitality which are more restrictive than those we impose – this may well be due to their differing bribery risk profile or playing to the lowest common denominator.
- Clients may also ask you to provide the details of the value of hospitality. Please refer any such questions to a Director. We are keen to assist our clients in terms of their own compliance.

Signed *M Darling*

M Darling
Director
02/01/24