

HR POLICY – ANTI-BRIBERY

OWNER	Group HR Manager
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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 dealings wherever we operate. We are also committed to implementing and enforcing effective systems to counter bribery.

WHAT IS BRIBERY?

As a legal concept, under the new Bribery Act, bribery is a “financial or other advantage” offered, promised or given to induce a person to perform a relevant function improperly or to reward them for doing so.

In practical terms, this is a broad-ranging definition which would cover gifts, hospitality, entertainment, political or charitable donations and giving publicity or sponsorship.

The UK Bribery Act 2010 applies to the activities of a UK-based business no matter where the business activity is being carried out in the world. Therefore, this policy applies to all our activities worldwide, regardless of local laws, practices and customs.

If you are uncertain at any time if your actions will comply with this policy, then you must seek guidance from the HR department.

WHO IS COVERED?

This policy applies to all individuals working at all levels and grades, including senior managers, directors, employees (whether permanent, fixed term or temporary), consultants, contractors, and any other person providing services to us.

WHAT IS A BRIBE?

A 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
- to any public official with the intention of influencing the official in the performance of his duties.

GIFTS AND HOSPITALITY

This policy does not prohibit giving and receiving promotional gifts of low value and normal and appropriate hospitality. However, in certain circumstances gifts and hospitality may amount to bribery and all employees must comply strictly with our ethics policy in respect of gifts and hospitality. We will not provide gifts or hospitality with the intention of persuading anyone to act improperly or to influence a public official in the performance of his duties.

DONATIONS

We do not make contributions of any kind to political parties. No charitable donations will be made for the purpose of

gaining any commercial advantage.

RECORD KEEPING

We will keep financial records and have appropriate internal controls in place which will evidence the business reason for making any payments to third parties. All expense claims relating to hospitality, gifts or expenses incurred to third parties must be submitted in accordance with our expenses policy and specifically 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, must be prepared and maintained with strict accuracy and completeness.

RAISING CONCERNS

Employees will be encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. No employee will suffer any detriment as a result of raising genuine concerns about bribery, even if they turn out to be mistaken.

WHAT WILL THE GROUP DO?

If someone is accused of bribery or of breaching any part of this policy, the allegations will be investigated internally in a confidential manner by HR.

Following these investigations and if conduct is found to be of concern, the Company disciplinary procedures will be followed and appropriate action taken, the result of which may be dismissal of the accused.

In the case of proven bribery, or suspected bribery of a serious nature, the Company reserves the right to refer the matter to the police.

REVIEW

This policy will be reviewed on an annual basis.

REVISION HISTORY	CHANGE DESCRIPTION	DATE
1.0	Updated by HR into Group formatting	1 st January 2023