



---

# ANTI-BRIBERY POLICY

---

## Introduction

The Bribery Act 2010 defines bribery as ‘giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly, or to reward that person for having already done so’. The Company is committed to preventing bribery by all its employees and any other person associated with it, thus seeking an organisational culture in which bribery is never acceptable.

The Company shall therefore:

- Comply with the spirit, as well as the letter, of UK laws and regulations.
- Act with honesty, integrity and transparency at all times.
- Conduct all its business relationships in a fair, ethical and lawful manner.

Of the range of actions that can be taken to minimise corruption, by far the most beneficial is deterrence. Reducing the likelihood of corruption occurring in the first place is preferable to reacting after the event. However, it is recognised that preventing corruption cannot merely be a matter of internal control but must be based on a process that extends throughout the culture of the organisation.

It is therefore Company policy to:

- Value personal and corporate integrity – by the demonstrable actions of management in setting the tone from the top of the organisation.
- Not accept or tolerate corruption of any kind.
- Encourage a climate where employees know that they will be supported if they report suspicious or questionable activity, provided they act in good faith.
- Require all employees to report any suspicions they may have of questionable activity that comes to or is brought to their attention.

## Policy Principles

The Ministry of Justice Bribery Act Guidance sets out six principles for the prevention of bribery:

1. Proportionate Procedures
2. Top-Level Commitment
3. Risk Assessment
4. Due Dilligence
5. Communication and Training
6. Monitoring and Review

In order to reinforce its commitment to these principles, the Company requires that all employees are made aware of, and shall abide by, the guidance set out below.

### **Conflicts of Loyalty or Interest**

All employees are expected to inform their Line Manager, or Compliance Manager if they find themselves in a situation where their loyalty to the Company conflicts with personal interest. The Manager must then report it to the Managing Director.

### **Gifts and Entertaining**

The Company shall only accept or provide gifts or entertainment for business purposes and those which are not considered material or frequent. It is a key requirement that gifts or entertaining should not be given or received on such a scale that they form an inducement for one party to do business with the other, which may not otherwise be undertaken.

It is strictly forbidden for any employee, or anyone acting on their behalf, to offer, promise, or pay anything of value to another person to influence or reward any action by that person. 'Anything of value' might include bribes (cash or otherwise), kickbacks, valuable 'items' or any other inducement.

### **Breaching the Policy**

All employees are required to observe and abide by this Policy. Breaches will be investigated and dealt with in accordance with the Company's disciplinary procedure. The extent of a breach of this policy may, under certain circumstances, be so severe as to be considered an act of gross misconduct, for which summary dismissal is the likely outcome. If in any doubt as to what is and what is not acceptable, seek guidance from a senior manager. The Company will avoid doing business with other companies who do not demonstrate that they are committed to conducting business without bribery as a 'best practice' objective.

### **Implementation**

All employees and associated persons will be made aware of the Company's policy on anti-corruption, which shall be regularly reviewed to ensure it remains current and relevant. Responsibility for the monitoring, review and evaluation of anti-corruption and bribery prevention procedures lies with the Managing Director.

This policy is reviewed and updated regularly to take account of changing legislation.

**Name:** Oliver Hazell

**Signature:**



**Position:** Managing Director

**Date:** 13<sup>th</sup> January 2023