

OUR POLICY ON ANTI-CORRUPTION AND BRIBERY

What's this policy about?

Our aim is to conduct 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 at all times.

Is this policy part of my contract of employment?

No, and we can change this policy at any time, but if any changes are made, we'll always make you aware of them. We may also vary things like time limits, if we feel we need to.

Who's covered by this policy?

This policy applies to anyone who works for us or on our behalf, in any capacity, regardless of where they are located. This includes employees, directors and other officers, workers, agency workers, contractors, consultants, third-party representatives, agents and business partners (or '**Staff**').

Who's responsible for this policy?

While we ask all managers to take responsibility for making sure this policy is complied with, its successful operation also depends on you, and that you let us know about any suspected wrongdoing. Please take the time to read and understand this policy, and to go back to your manager with any questions you may have. Directors (the most senior people within our organisation) have overall responsibility for making sure this policy complies with our legal and ethical obligations, and that it's followed by everyone it applies to.

What is bribery and corruption?

Bribe means a financial or other incentive or reward for any action that is illegal, unethical, abuses a position of trust or is otherwise improper. Bribes can include money, gifts, loans, fees, hospitality, services, discounts, the award of a contract, or anything else valuable.

Bribery means offering, promising, giving, accepting or seeking a bribe. Any form of bribery is strictly forbidden. If you're unsure if a situation might be considered bribery, please speak to your manager for advice.

Does this policy also apply to gifts, hospitality and expenses?

This policy doesn't stop you from giving or receiving reasonable and appropriate gifts or hospitality to or from others if it's only to:

- establish or maintain good business relationships,
- maintain our image or reputation, or
- market our products and/or services effectively.

You can also give and accept gifts if:

- it's a promotional gift of low value (such as branded stationery),
- there's no intention of influencing anyone to obtain or keep business, to obtain another advantage, or to reward either person,
- there's no explicit or implicit exchange for favours or benefits,
- it's given in our name, not in your name,
- it doesn't include cash or a cash equivalent (such as gift certificates or vouchers),
- it's appropriate in the circumstances, taking into account the reason for the gift, timing and value (for example, it's common in the UK to receive small gifts at Christmas),
- it's given openly, not secretly, and
- it complies with all applicable laws.

If you are unsure whether a gift or hospitality is reasonable or appropriate, please discuss it with your manager beforehand.

What can I NOT do?

You, or anyone on your behalf, cannot:

- give, promise or offer a payment, gift, hospitality or other benefit with the expectation or hope of receiving a work-related advantage in return, or as a reward for an advantage received,
- give or accept a gift or hospitality during any commercial negotiations or tender process if it could be seen as influencing the outcome,
- accept any offer from a third party that you know (or think) is expecting a work-related advantage for them or anyone else in return,
- accept hospitality from a third party that is overly lavish or extravagant under the circumstances,
- give or offer a payment (sometimes called a facilitation payment) to a government official in any country to secure or speed up a routine or necessary action or procedure,
- threaten or retaliate against any other person who has refused to offer or accept a bribe or who has raised concerns under this policy, or
- do anything else that could lead to a breach of this policy.

What are my other responsibilities?

Please make sure that you have read, understood and comply with this policy.

All Staff are responsible for preventing, detecting and reporting bribery and any other forms of corruption. Avoid doing anything that could lead to a breach of this policy.

Please notify your manager as soon as possible if you think that this policy has been or may be breached.

It is important to understand that any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We may also terminate our contract with any third party working on our behalf if they breach this policy.

Records of payments

It's important to tell your manager and keep a written record of all gifts or hospitality given or received.

You need also to:

- submit all expense claims for gifts, hospitality or payments made to third parties in line with our Expenses Policy, recording the reason for the expense, and
- keep all accounts, invoices and other records about dealings with third parties, including suppliers and customers, accurate and complete – it is important that no records are kept 'off-book' to facilitate or hide any improper payments.

How can I raise a concern?

If anyone offers you a bribe, or if you are asked to make one, or if you think any bribery or corruption or any other breach of this policy has happened or may happen, please tell your manager as soon as possible.

And that's it... for now

We understand that things change, so we'll continue to review the effectiveness of this policy and make sure it's achieving its objectives.