

Anti-Bribery

Policy Document

1. Introduction

It is our policy to conduct all of our business in a transparent, 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. Any breach of this policy will be regarded as a serious matter by the Company of which is likely to result in disciplinary action.

Under UK law (UK Bribery Act 2010), bribery and corruption is punishable for individuals by up to ten years imprisonment. If the company is found to have taken part in the corruption or lacks adequate procedures to prevent Bribery, it could face an unlimited fine and, be excluded from tendering for Government contracts and face untold damage to its reputation.

2. Scope

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.

3. 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.

No bribes of any sort may be paid or accepted from customers, suppliers, politicians, government advisors or representative's private person or Company. It is not permitted to establish accounts or internal budgets for the purpose of making facilitation bribes or influencing transactions (slush funds).

4. Gifts and Hospitality

This policy does not prohibit giving and receiving promotional gifts of low value and normal and appropriate 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.

5. Kickbacks

We do not make, and will not accept, "kickbacks" of any kind. Kickbacks are typically payments made in return for a business favour or advantage. All employees must avoid any activity that might lead to, or suggest, that a kickback will be made or accepted by us.

6. 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.

7. 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.

Doc Ref & Version	Owner	Date implemented
POL0015 (V3)	Richard Bent	August 2012

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, will be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

8. **Raising Concerns**

Employees are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage; the Employee Handbook section on Whistle-Blowers outlines the process to be followed. No employee will suffer any detriment as a result of raising genuine concerns about bribery, even if they turn out to be mistaken.

9. **Monitoring**

The effectiveness of this policy will be regularly reviewed by the Managing Director. Internal control systems and procedures will be subject to audit under the internal audit process.

10. **Policy Review**

The Managing Director undertakes to periodically review this policy in light of current and planned future activities, on an annual basis, and more frequently when legislation or industry best practice dictates.

Signed: 
Richard Bent
Managing Director

Date: January 2019

Next review date: January 2020

Doc Ref & Version	Owner	Date implemented
POL0015 (V3)	Richard Bent	August 2012