

## **BRIBERY POLICY**

Bribery is a criminal offence in most countries and penalties can be severe. In the UK the Bribery Act 2010 not only makes bribery illegal, but also holds UK companies liable for failing to implement adequate procedures to prevent such acts by those working for the company or on its behalf.

Bribes can take on many different shapes and forms, but typically they involve corrupt intent. Both parties will usually benefit from a bribe and a bribe could therefore be:

- A promise, offer or an authorisation of anything of value to another party
- An offer of a reward or other advantage
- The giving of gifts, hospitality, aid or donations
  - in return for doing something that gives a reward, advantage, financial or other benefit to the other party, and/or that is intended to influence a decision being taken or a contract or service awarded.

The company will meet its legal obligation to prevent bribery in any form and therefore prohibits employees offering, giving, soliciting or accepting any bribe, whether cash or other inducement, to or from any person or company in order to gain any commercial, contractual or regulatory advantage in a way which is unethical, or in order to gain a personal advantage, financial or otherwise, for the individual or anyone connected with the individual.

This policy will also apply, to any other person or body who purports to be acting on behalf of the company or an employee of the company.

What is a reasonable and appropriate hospitality such as the giving of say a gift on a festive or other special occasion from individuals or companies (but not between employees) will be for senior management to decide upon, and any offer must be referred to senior management before acceptance, unless previously authorised. Gifts could include free tickets to entertainment or a sports event.

The prevention, detection and reporting of bribery is the responsibility of all employees and a suspicion of bribery or potential inappropriate behaviour or actions must be reported to senior management, who will deal with the situation in a confidential manner.

Anyone who is suspected or is found to be involved in bribery (including asking others to act on their behalf) will be subject to disciplinary action for gross misconduct, as well as being the subject of criminal proceedings.

Failure to report bribery or suspicion of bribery will also be considered to be gross misconduct and subject to disciplinary proceedings.

**Signed:**

**Position: Managing Director**

A handwritten signature in black ink, appearing to be 'M. J. [unclear]', written over the printed name 'Managing Director'.

**Dated: February 2019**