

Bribery and Corruption Policy

Introduction

This Company is committed to implementing and enforcing effective systems to counter bribery. Therefore, it is the Company's policy to always conduct all aspects of its business in an honest and ethical manner.

This policy applies to all individuals working for the Company, including anyone providing services to the Company such as consultants, or contractors.

Policy Aim

The aim of this policy is to help the Company act in accordance with the Bribery Act 2010, maintain the highest possible standards of business practice, and advise individuals of the Company's 'zero-tolerance' to bribery.

The Law

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.

Policy Statement

This policy applies to all permanent and fixed-term staff employed by the Company, and any contractors, consultants or other persons acting under or on behalf of the Company.

The company will not:

- Make contributions of any kind with the purpose of gaining any commercial advantage.
- Provide gifts or hospitality with the intention of persuading anyone to act improperly, or to influence a public official in the performance of their duties.
- Make, or accept, "kickbacks" of any kind.

The Company will:

- Keep appropriate internal records that will evidence the business reason for making any payments to third parties.
- Encourage employees to raise concerns about any issue or suspicion of malpractice at the earliest possible stage.
- See that anyone raising a concern about bribery will not suffer any detriment as a result, even if they turn out to be mistaken.

Employee Responsibility

Employees must not:

- Accept any financial or other reward from any person in return for providing some favour.
- Request a financial or other reward from any person in return for providing some favour.
- Offer any financial or other reward from any person in return for providing some favour.

Gifts and Hospitality

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

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Receiving Business gifts:

- Receiving promotional gifts of low value is normal and appropriate, however, gifts with a value exceeding £25.00 may not be accepted without approval. Any gift offered and then refused because of its value, must be reported to The Company.

Offering Business gifts:

- Business gifts are primarily aimed at thanking customers and suppliers for their custom and loyalty, only authorised gifts may be given.

Receiving Hospitality:

The acceptance of corporate hospitality must be transparent; all invitations must be reported to the company before an employee accepts any invitation. The following areas are exempt while attending conferences, seminars, sponsored by third parties.

- business and travel expenses incurred
- normal business lunches and meals

Offering gifts and hospitality:

- Company hospitality is primarily aimed at thanking customers and suppliers for their custom and loyalty. All hospitality events must have approval.

Donations to organisations:

- No donations should be made to charities, political parties or other organisations without approval.

Non Compliance

Staff

Failing to observe Company policy may lead to disciplinary action in accordance with the Company's Disciplinary Policy.

Visitors

In the event of a breach of the policy by other organisations, or individuals, the Company will take appropriate action.

Monitoring Policy

The policy will be monitored on an on-going basis to ensure that it addresses issues effectively.

The following will be monitored:

- That all individuals working for the Company are advised of the policy.
- Assessment of any reported incident or related occurrence.

Monitoring of the policy is essential to assess how effective the Company has been to establish control of its obligations.

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Definitions

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, with the intention of influencing them in the performance of their duties.

Hospitality is the practice of being hospitable, this includes the reception and entertainment of guests / visitors.

Kickbacks or facilitation payments are typically small payments made in return for a business favour or advantage.

Reviewing Policy

This policy will be reviewed and, if necessary, revised in the light of legislative or organisational changes. Improvements will be made by learning from experience and the use of an established annual review.

Policy Amendments

Should any amendments, revisions, or updates be made to this policy it is the responsibility of the Company senior management to see that all relevant employees receive notice. Written notice and/or training should be considered.

Signed.....

S Kuligowski

