

# Anti-Bribery & Corruption Policy

Bribery and corruption remain a major issue in world trade, despite the many dedicated efforts to prevent them. Our legal obligations are primarily governed by the Bribery Act 2010. The Act affects us, as a UK company, if bribery occurs anywhere in our business. Involvement in bribery and corruption exposes us and relevant individuals to a criminal offence. It will also damage our reputation and the confidence of our customers, suppliers, and business partners.

Our position is simple; we conduct our business to the highest legal and ethical standards. We will not be party to corruption or bribery in any form. Such acts would damage our reputation and expose us, and our employees and representatives, to the risk of fines and imprisonment.

We run our company with integrity and in an honest and ethical manner. All of us must work together to ensure that we are untainted by bribery or corruption. This policy is a crucial element of that effort and is the personal responsibility of Bridget Ferrington, Managing Director. However, the policy needs the full support of you, to make it work. This policy sets out the steps all of us must take to prevent bribery and corruption in the company to comply with relevant legislation and our requirements. It does not form part of your contract of employment, and we may amend it at any time.

## PRINCIPLES AND RESPONSIBILITIES

What are Bribery and Corruption?

A 'bribe' is a financial or other advantage offered, promised, requested, or given to induce a person to perform a relevant function or activity improperly, or to reward them for doing so. In this context, a 'financial or other advantage' is likely to include cash or cash equivalent, gifts, hospitality and entertainment, services, loans, preferential treatment in a tendering process, discounts etc. The timing of the bribe is irrelevant, and payments made after the relevant event will still be caught, as will bribes that are given or received unknowingly. It is not necessary for the individual or organisation to receive any benefit as a result of the bribe.

- Bribery

Includes offering, promising, giving, accepting, or seeking a bribe.

- Corruption

Is the misuse of office or power for private gain.

All forms of bribery and corruption are strictly prohibited. If you are unsure about whether a particular act constitutes bribery, you should raise it with your line manager.

This means that no person must:

- give or offer any payment, gift, hospitality, or other benefit in the expectation that a business advantage will be received, or to reward any business received.
- accept any offer from a third-party that you know, or suspect is made with the expectation that we will provide a business advantage for them or anyone else.
- give or offer any payment (sometimes known as a 'facilitation payment') to a government official in any country to facilitate or speed up a routine or necessary procedure.

No person must threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption. It does not matter whether the bribery occurs in the UK or abroad. A corrupt act committed abroad may well result in a prosecution in the UK or a country which has similar legislation. Nor does it matter whether the act is done directly or indirectly.

### **Who can be Involved in Bribery and in what Circumstances?**

Bribery and corruption may be committed by anyone working for us or on behalf in any capacity, such as our employees, officers or directors, anyone they authorise to do things on their behalf, our representatives and other third parties who act on our behalf, our suppliers and even our customers. This policy applies to any such individual. Bribery can occur in both the public and private sectors. The person receiving the bribe is usually able to influence the award or the progress of business, often a government or other public official.

### **Gifts and Hospitality**

We forbid any of our staff from soliciting any gift or hospitality in the course of their work for us. We also forbid any of our staff from offering or receiving from any person or organisation who has had, has, or may have any influence over our business any gift or hospitality which is unduly lavish or extravagant or otherwise inappropriate, or which could be seen as an inducement or reward for any preferential treatment. We regard the following to be inappropriate (the list is not exhaustive):

- An excessive or high value personal or corporate gift.
- an excessive or high value level of hospitality.
- any gift that includes cash or a cash equivalent (such as vouchers);
- any gift or hospitality given or received in secret; and
- any gift or hospitality given or received in your name rather than our name.

### **Records**

It is essential that we keep full and accurate records of all our financial dealings. Transparency is vital; false or misleading records could be very damaging to us. Under money laundering regulations our lawyers and accountants are obliged to report anything which appears to be irregular. You must therefore declare and properly record (in writing) all hospitality and gifts given or received. All accounts, invoices, credit notes, purchase orders and other records relating to dealings with third parties (including suppliers and customers) must be properly recorded.

We also forbid any of our staff from offering or receiving from any person or organisation who has had, has or may have any influence over our business any gift or hospitality which is unduly lavish or extravagant or otherwise inappropriate, or which could be seen as an inducement or reward for any preferential treatment. We regard the following to be inappropriate (the list is not exhaustive):

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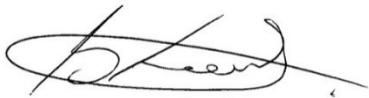
**What to do if you Think Something is Wrong**

Each of us has a responsibility to speak out if we discover anything corrupt or otherwise improper occurring in relation to the business. If you are offered a bribe, or are asked to make one, or if you discover or suspect that any bribery or corruption has occurred or may occur, you must notify your line manager as soon as possible. You must report this as soon as reasonably practicable, and you may be required to explain any delays.

**COMPLIANCE WITH THIS POLICY**

We take compliance with this policy very seriously. Failure to comply puts both individuals and us at risk. Individuals may commit a criminal offence if they fail to comply with this policy. The criminal law relating to bribery and corruption carries severe penalties. Because of the importance of this policy, failure to comply with any requirement of it may lead to disciplinary action under our procedures, and this action may result in dismissal for gross misconduct. Any non-employee who breaches this policy is liable to have their contract terminated with immediate effect.

Signed



Bridget Ferrington  
Managing Director  
4<sup>th</sup> January 2024