

CONTROL OF BRIBERY POLICY

Introduction:

It is our policy to conduct all our business in an honest and ethical manner. We take a zero-tolerance approach to bribery, **fraud in all its forms** and corruption, and are committed to acting professionally, fairly and with integrity in all our dealings wherever we operate. We are committed to implementing and enforcing the provisions of this policy in line with the Bribery Act 2012.

Who is covered by the policy

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 works or services to the company.

Bribe – definition:

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 their duties.

Gifts and Hospitality:

This policy does not prohibit giving and receiving promotional gifts of low value and normal and appropriate hospitality. However, in certain circumstances gifts and hospitality may amount to bribery and all employees must report all gifts and hospitality to the Company. 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 their duties

Facilitation payments and kickbacks:

We do not make, and will not accept, facilitation payments or “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 facilitation payment or kickback will be made or accepted by us.

Donations:

No charitable donations will be made for the purpose of gaining any commercial advantage.

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.

All expense claims relating to hospitality, gifts or expenses incurred to third parties must be submitted in accordance with our rules.

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

Raising Concerns:

Employees will be encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. No employee will suffer any detriment as a result of raising genuine concerns about bribery **or fraud**, even if they turn out to be mistaken.

Implementation & Review:

The implementation of this policy is the responsibility of the Managing Director assisted by senior management. This policy shall be reviewed annually & if legislation, regulation or policies change.

S Bettsworth

S Bettsworth
Managing Director