

Anti-Bribery Policy

Purpose

The purpose of this policy is to set out the rules that must be followed in this organisation to ensure that no bribery occurs.

Scope

This policy applies to all employees, officers of the organisation workers, consultants, contractors and subsidiaries acting for and on behalf of the organisation.

Definition

Bribery is the accepting of gifts, money, hospitality or other favours in return for providing something of value to the briber.

Unacceptable behaviour

The following behaviour is unacceptable, and must not occur in this organisation:

- Accepting any financial or other reward from any person in return for providing some favour
- Requesting a financial or other reward from any person in return for providing some favour
- Offering any financial or other reward from any person in return for providing some favour.

Business gifts

From time to time, customers, suppliers or other persons might offer a gift to an employee. This could be a small item, or something of considerable value. All gifts, however small, must be reported to a senior manager or director and recorded. No gifts with a value of more than *[insert amount]* may be accepted. If a gift is offered and then refused because of its value, this must be reported to a senior manager or director.

Hospitality

From time to time, customers, suppliers or other persons might invite an employee to a hospitality event. All such invitations must be reported to a senior manager or director. Permission must be given by a senior manager or director before an employee accepts any invitation.

Offering gifts and hospitality

It is this organisation's custom to offer small gifts (eg pens, diaries) to customers, suppliers and other persons. If a gift is authorised by *[insert position]* the employee is entitled to give it to the appropriate individuals. A record must be kept of all gifts.

This organisation occasionally runs hospitality events, primarily aimed at thanking customers and suppliers for their custom and loyalty. An employee must not organise any additional hospitality event without seeking authority from a senior manager or director.

Facilitation payments

We do not make or accept facilitation payments. These are payments made to government officials for carrying out or speeding up routine procedures. They are more common overseas. Facilitation payments are distinct from an official, publicly available fast-track process. Facilitation payments, or offers of such payments, will constitute a criminal offence by both the individual concerned and the organisation under the Bribery Act 2010, even where such payments are made or requested overseas. You are required to act with greater vigilance when dealing with government procedures overseas and should refer any requests to a senior manager or director.

Manager responsibilities

Managers are responsible for keeping a record of all gifts and hospitality that are offered and/or received by employees working in their department/s.

If a manager is concerned about any actions, they should contact the managing director immediately for advice.

Managers are also responsible for ensuring that all their employees are aware of this policy, and fully understand the rules in relation to the acceptance of gifts and hospitality.

Expenses

Managers must authorise all expense claims from their employees. Managers are expected to check and sign all expense claims from their employees against receipts.

Any items of expenditure that give rise to concern should be fully investigated.

Attempts to bribe

If you are concerned you are potentially being bribed you should report this matter to senior manager or director immediately.

Donations to organisations

The organisation makes regular donations to charity. These are managed by *[insert position]*. You should not make donations to a charity without their approval.

No donations should be made to charities, political parties or other organisations with the intention of gaining a business advantage.

Disciplinary action

Any employee found to have offered or accepted a bribe will face disciplinary action which could include dismissal for gross misconduct.

Raising concerns

If you are concerned that acts of bribery are occurring in the organisation you should inform your manager or a director in the first instance. If this course of action is inappropriate, you should inform another senior manager.

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Contacting the Police

Where we reasonably believe that an employee has committed a criminal act whilst undertaking their duties we will inform the police and provide all available evidence of criminality to assist in their investigations.

Policy Issue Date	Director Signature
11 th April 2025	