

Anti-Bribery Policy

This policy outlines the Company's position on preventing and prohibiting bribery, in accordance with the Bribery Act 2010. The Company will not tolerate any form of bribery by, or of, its employees, clients, agents or consultants or any person or body acting on its behalf.

Bribery Act 2010

The Company is committed to complying with the Bribery Act 2010 in its business activities.

Under the Bribery Act 2010, a bribe is a financial or other type of advantage that is offered or requested with the:

- intention of inducing or rewarding improper performance of a function or activity; or
- knowledge or belief that accepting such a reward would constitute the improper performance of such a function or activity.

A relevant function or activity includes public, state or business activities or any activity performed in the course of a person's employment, or on behalf of another company or individual, where the person performing that activity is expected to perform it in good faith, impartially, or in accordance with a position of trust.

A criminal offence will be committed under the Bribery Act 2010 if:

- an employee or associated person acting for, or on behalf of, the Company offers, promises, gives, requests, receives or agrees to receive bribes; or
- an employee or associated person acting for, or on behalf of, the Company offers, promises or gives a bribe to a foreign public official with the intention of influencing that official in the performance of his/her duties (where local law does not permit or require such influence); and
- the Company does not have the defence that it has adequate procedures in place to prevent bribery by its employees or associated persons.

What is prohibited?

The Company prohibits:

- the offering, the giving, the socialisation or the acceptance of any bribe, whether cash or other inducement.



- *to or from*
any person or company, wherever they are situated and whether they are a public official or body or private person or company.
- *by*
any individual employee, agent or other person or body acting on the Company's behalf.
- *in order to*
gain any commercial, contractual or regulatory advantage for the Company in a way which is unethical.
- *or in order to*
gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.

Enticement

Should any employee be requested by a client to provide them with a personal reward or gain or enter into any form of collusion which does not follow ethical contract administration, in exchange for them placing or potentially placing work with the company, the request should be refused. The event must be immediately documented, detailing the time, date, person and circumstance surrounding the requests, along with any supporting evidence. The employee must then raise the matter directly with the Anti-Bribery Officer. The matter will then either be informally or formally raised with the Client organisation at the appropriate level, depending on the extent of the requested incitement and evidence to support the claim.

Gifts and Hospitality

The Company permits corporate entertainment, gifts, hospitality and promotional expenditure that is undertaken:

- for the purpose of establishing or maintaining good business relationships;
- to improve the image and reputation of the Company; or
- to present the Company's goods/services effectively;

Provided that it is:

- arranged in good faith, and
- not offered, promised or accepted to secure an advantage for the Company or any of its employees or associated persons or to influence the impartiality of the recipient.

Donations

We do not make contributions of any kind to political parties. 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 expenses procedure and should specifically record the reason for the expenditure.

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.

Reporting Suspected Bribery

Employees will be encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage to the Anti-Bribery Officer. No employee will suffer any detriment as a result of raising genuine concerns about bribery, even if they turn out to be mistaken. The Company has a nominated Anti-Bribery Officer (the Finance Director).

Compliance with the Policy

Any act of bribery in whatever form is unacceptable. The Company will consider taking disciplinary action against any employee who fails to comply with the Anti-Bribery Policy up to and including dismissal. Failure to comply with this policy may also leave you open to a criminal prosecution under the Act. The Company may also report any matter to the relevant authorities. An offence under the Act can result in a fine and/or up to a maximum of 10 years imprisonment. The Company will provide all necessary assistance to the relevant authorities in any subsequent prosecution.

Nelson Williams
Managing Director

(This policy will be reviewed in January 2023)

