

**SIGNED POLICIES BY DIRECTOR**

**ANTI-BRIBERY  
EQUAL OPPORTUNITIES  
GDPR  
WHISTLEBLOWING  
MODERN SLAVERY / TRAFFICKING**

<b>SOA</b>	-
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Source:	Company Handbook with amendments
Version No:	2.2
Date:	19 <sup>th</sup> October 2020

**SINCE 1972**  
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inform & protect

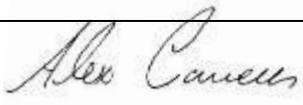
## Document Control

### Version History

Version No	Version Date	Author	Summary of Changes
1.0	18/07/2019	Hugh Lawson	First Issue
2.0	26/05/2020	Hugh Lawson	Inclusion of GDPR and Anti-Bribery
2.1	02/09/2020	Hugh Lawson	Inclusion of Modern Slavery / Trafficking
2.2	19/10/2020	Hugh Lawson	Involvement of Police

### Approvals

Name	Title	Date of Approval	Version No
Susan McLeay	Human Resource Manager	19/10/2020	2.2
Alex Cassells	Managing Director	19/10/2020	2.2

Reviewed by Managing Director	19 <sup>th</sup> October 2020	
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## ***Anti-Bribery Procedure***

Pointer is committed to the prevention of bribery by those employed and associated with it. Pointer is committed to carrying out business fairly, honestly and openly, with zero-tolerance towards bribery.

This is achieved by:

1. carrying out a risk assessment to ascertain the risk of bribery
2. instigating procedures proportionate to that risk
3. having good internal controls and record-keeping
4. securing the commitment of the managers and staff to the prevention and detection of bribery
5. developing a culture in which bribery is unacceptable
6. undertaking due diligence procedures proportionate to the assessed risk of bribery
7. effectively communicating the anti-bribery policy to all staff
8. training all staff to recognise bribery so that they can avoid it and be alert to possible instances of bribery
9. having clear procedures on what to do should bribery be suspected
10. monitoring and reviewing the effectiveness of the bribery procedures and updating them as necessary to ensure that they remain effective.

### *Offering bribes*

Pointer expressly prohibits any person employed by or associated with it from offering, promising or giving any financial or other advantage to another person where it is intended that the advantage will bring about improper performance by another person of a relevant function or activity, or that the advantage will reward such improper performance.

Pointer prohibits any person employed by or associated with it from offering, promising or giving any financial or other advantage to another person where it is believed that the acceptance of the advantage offered, promised or given in itself constitutes the improper performance of a relevant function or activity.

### *Accepting bribes*

Pointer expressly prohibits any person employed by or associated with it from requesting, agreeing to receive or receiving any financial or other advantage with the intention that a relevant function should be performed improperly as a result of the advantage or as a reward for performing the relevant function improperly.

The improper performance of a relevant function in anticipation of receiving financial or other advantage is also prohibited.

### *Bribing a public official*

Pointer expressly prohibits the bribing of a UK or foreign public official in order to obtain or retain business or an advantage in the conduct of business.

### *Relevant functions and activities*

Relevant functions and activities are any function of a public nature, any activity connected with the business, any activity performed in the course of a person's employment and activity performed by or on behalf of a body of persons where the person performing that function or activity is expected to perform it impartially, in good faith, or is in a position of trust by virtue of performing it.

### *Hospitality and business gifts*

The Bribery Act 2010 does not seek to prohibit reasonable and proportionate hospitality, advertising, sponsorship and promotional or other similar business expenditure, as it is recognised that this constitutes an established and important part of doing business.

However, hospitality, promotional and similar business expenditure can be used as bribes.

Pointer expressly prohibits the giving and receiving of hospitality/business gifts and similar where the intention in doing so is to receive or confer an advantage in return for giving or receiving the hospitality/business gift or similar.

The following procedures should be adopted in relation to hospitality and business gifts.

1. All offers of business gifts should be referred to the appropriate Director and should only be accepted if clearance has been received from him.
2. Business gifts should not be made without the permission of the appropriate Director.
3. A record of all business gifts made and received and the reason for the gift should be retained.
4. All hospitality must be proportionate and reasonable. Guidance should be sought from the appropriate Director as to whether the planned hospitality is proportionate and reasonable.
5. Records should be maintained of all hospitality provided and accepted, including cost and reason for providing or accepting the hospitality.
6. Cash gifts are expressly prohibited.
7. Acceptable hospitality and entertaining may include modest meals with people with whom we do business (such as providing a modest lunch after a meeting) or the occasional provision of or attendance at sporting or cultural events, provided that the intention is to build business relationships rather than to receive or confer an advantage.
8. The provision of small promotional gifts, such as diaries, pens or similar, will generally be regarded as acceptable.
9. Staff reviewing expense claims should be alert to the provision of hospitality/business gifts that may be construed as a bribe.
10. All concerns should be reported.

### **Reporting concerns**

All members of staff have a responsibility to prevent, detect and report all instances of bribery. Staff should therefore be alert to the possibility of bribery.

Anyone who has concerns regarding acts or potential acts of bribery should speak to their Line Manager in the first instance. If for any reason a person is not able to speak to his or her Line Manager, he or she should contact the Managing Director.

All reports will be treated with the utmost confidentiality. However, concerns can be reported anonymously to the appropriate Director.

If appropriate, Pointer will involve the Police if the findings have shown that the Law has been broken.

## ***Equality***

Pointer is an equality employer. Equality is about good employment practices and efficient use of our most valuable asset, our employees. Every manager and employee has personal responsibility for the implementation of the policy. Any instance of doubt about the application of the policy, or other questions, should be addressed to your manager, as should any requests for special training.

Pointer will not discriminate on grounds of sex, trans-gender status, pregnancy or maternity, sexual orientation, religion or beliefs, marital status, civil partnership status, race, ethnic origin, colour, nationality, national or ethnic origins, disability or age, or any other grounds (whether prohibited by legislation or otherwise).

The non-discrimination principle inherent in this policy includes the prohibition of discrimination against an individual because he or she associates with someone of a particular race, religion, sexual orientation, age, etc, for example an employee who is married to someone of a minority ethnic origin or who socialises with gay or lesbian friends

The prohibition on discrimination applies equally to situations where someone thinks or perceives (whether rightly or wrongly) that a colleague is of a particular race, sexual orientation, religion, age, sex or that he or she has a disability, is a trans-gender person, or is pregnant

The policy applies to the process of recruitment and selection, promotion, training, conditions of work, pay and benefits and to every other aspect of employment, including general treatment at work and the processes involved in the termination of employment.

Where increased pay and/or enhanced benefits are offered to employees on the basis of length of service, these are intended to reward loyalty, maintain motivation and reflect higher levels of relevant experience

The policy applies to job applicants (both internal and external) and all employees and other workers whether full time, part time, temporary, seasonal or contract.

Employees should note that the imposition of any provision, criterion or practice which has a disproportionate adverse impact on someone for a reason related to sex, trans-gender status, race, married status, civil partnership status, religion or belief, sexual orientation, disability or age will be unlawful unless it can be objectively justified. In the event of any query or doubt, the HR Department should be consulted.

When establishing criteria for recruitment and promotion into vacant posts, Pointer will consider carefully whether any minimum or maximum number of years of relevant experience is necessary for effective performance of the job. Such restrictions will not be imposed unless there is a proper job-based reason why they are necessary.

Pointer does not operate any compulsory retirement age, and each employee may choose for him/herself when to stop working, subject to him or her continuing to be sufficiently fit to perform his or her job to a satisfactory standard.

Employees who are disabled or become disabled in the course of their employment should inform the organisation about their disability. Management will then arrange to discuss with you what reasonable adjustments to your job or working conditions or environment might assist you in the performance of your duties. You will also be encouraged to suggest any adjustments that you believe would be helpful. Careful consideration will be given to any proposals and, where reasonable and reasonably practicable, such adjustments will be made. There may, however, be circumstances where it will not be reasonable or reasonably practicable for the organisation to accommodate proposals put forward by you.

Any member of staff may use the Grievance Procedure to complain about discriminatory conduct. If the matter relates to sexual or racial harassment or harassment on the basis of trans-gender status, disability, sexual orientation, trans-gender status, religion or belief or age, then the complaint may be raised directly with the HR Department. The organisation is concerned to ensure that staff feel comfortable about raising such complaints. No individual will be penalised for raising such a complaint unless the substance of the complaint is untrue or the complaint is made in bad faith, for example out of malice.

Where an employee is falsely accused of discriminatory conduct, then he or she may implement the organisation's grievance procedure.

Any employee who makes a false accusation of harassment will be subjected to disciplinary action. In serious cases, such behaviour may be deemed to constitute gross misconduct and may result in summary dismissal

All employees and job applicants will be asked to complete a form denoting their sex, race, ethnic origin, age and any disabilities that they have. The organisation guarantees that the information provided on this form will be used solely for the purpose of monitoring the effectiveness of its equal opportunities policy.

This policy will be monitored on a regular basis by senior management. Where there are issues with the way the policy is working, these will be looked at closely with a view to identifying measures to improve the effectiveness of the policy.

### ***Personal Circumstances***

During your employment with the Company it is likely that there will be some changes in your personal circumstances such as change of address, marital status, telephone number etc. It is important that you tell us of these changes when they occur.

## ***GDPR Policy***

Pointer Ltd is committed to protecting all its customers, suppliers and team members by maintaining best practice data protection processes in line with all UK and EU law including the General Data Protection Regulations (GDPR).

Pointer Ltd is engaged in selling goods and services to corporate and public-sector enterprises and all marketing activity is directed at these enterprises. In the legitimate pursuit of this business we may hold data on individuals working in these organisations. This data is limited to name, job title, organization email address, telephone numbers and signatures. We do not hold personal data such as home addresses or any personal credit card details. We may hold bank details for customers depending on their method of payment. For any domestic or small commercial customers, we will hold name, address and contact information. We do not store credit or debit card information on our systems.

You have the right to object to how we process your personal information. You also have the right to access, correct, sometimes delete and restrict the personal information we use. In addition, you have a right to complain to us and to the Information Commissioners Office. Our Data Protection Officer for Customer Information is our Administration Manager.

In addition to the information you provide directly, we collect further information, for example from third party credit references and from looking at how you have used services we offer. Sometimes for your safety and for legal reasons we collect personal information by recording and monitoring calls and from CCTV.

We may ask you to provide contact information on our website to provide feedback or questions, the data submitted will be processed securely following our Information Security Management System processes.

We use your personal information (including Credit Checks) to provide you with products and services, to comply with the law and enforce our legal rights (including debt recovery), and to improve and market our products and services.

We need some personal information before we can provide our products and services to you. This is limited to names and contact information. In some cases, we won't be able to provide products and services to you if we don't have all the personal information we need.

We share personal information with our suppliers and other third parties where needed to provide you with the best products and services (see Our Partners section). We also share information with regulators, legal representatives and law enforcement. We do not process, store personal information outside countries in the EEA.

We keep your personal information securely, for as long as we need to for the purposes described.

We are required to use some personal data to meet regulatory requirements and to perform a contract with you. We will not pass your information onto other organisations other than those identified below in fulfilling your contact.

We will share name and contact information with our Security Monitoring Service and our Out of Hours Telephone Answering Service, Emergency Response Organisations such as Police Forces, Fire Brigades or Keyholding Services. Financial services such as Credit Check Services, Banking Services. We check that our suppliers follow local data protection laws / GDPR.

Pointer is registered to CyberEssentials Plus and ISO 27001 and externally audited by a UKAS Certification Body on how we gather, process, store and destroy information we hold.

We have introduced control measures to protect the data we hold, and we have the ability to prevent, detect and report data breaches in line with GDPR and ISO 27001 through our Information Security Incident Reporting Process.

## ***Whistleblowing***

This organisation encourages a free and open culture in dealings between its officers, employees and all people with whom it engages in business and legal relations. In particular, this organisation recognises that effective and honest communication is essential if concerns about breaches or failures are to be effectively dealt with and the organisation's success ensured.

This policy is designed to provide guidance to all those who work with or within the organisation who may from time to time feel that they need to raise certain issues relating to the organisation with someone in confidence.

Staff who raise genuine concerns under this policy will not under any circumstances be subjected to any form of detriment or disadvantage as a result of having raised their concerns.

This policy will apply in cases where employees genuinely believe that one of the following sets of circumstances is occurring, has occurred or may occur within the organisation that:

- a) criminal offence has been committed, is being committed or is likely to be committed
- b) a person has failed, is failing or is likely to fail to comply with any legal obligation to which he or she is subject
- c) a miscarriage of justice has occurred, is occurring or is likely to occur
- d) the health and safety of any individual has been, is being or is likely to be endangered
- e) c. the environment has been, is being or is likely to be damaged
- f) e. information tending to show any matter falling within any one of the preceding paragraphs has been, is being or is likely to be deliberately concealed.

There is no need for an employee to prove that the breach or failure that they are alleging has occurred or is likely to occur; a reasonable suspicion will suffice, i.e. where the employee reasonably believes that the information disclosed is substantially true. Employees should, however, note that they are not entitled to make a disclosure if in so doing they commit a criminal offence.

If employees wish to raise or discuss any issues which might fall into one of the categories listed in clause (1), they should contact the HR Department. This person will, insofar as is possible, treat the matter in confidence. It is likely that an investigation will be necessary and the employee who has made the disclosure may be required to attend an investigatory hearing and/or a disciplinary hearing (as a witness). Appropriate steps will be taken to ensure that the employee's working relationships are not prejudiced by the fact of the disclosure.

If employees reasonably believe that the relevant failure (i.e. one of the set of circumstances listed above under clause (1) relates wholly or mainly to the conduct of a person other than their employer or any other matter for which a person other than the organisation has legal responsibility, then they should make that disclosure to that other person.

Also, employees may make such a disclosure to Public Concern at Work, the leading authority on public interest whistleblowing, if they consider that it has an interest in the matter and, despite the best efforts of the organisation, employees believe that disclosure within the organisation is inappropriate or has been unsuccessful. Disclosures made to employees' legal advisors in the course of obtaining legal advice will be protected.

Employees should be aware that the policy will apply where a disclosure is made which they reasonably believe is substantially true. If any disclosure is made to cause disruption within the organisation, or concerns information which employees do not substantially believe is true, or indeed if the disclosure is made for personal gain, then such a disclosure will constitute a disciplinary offence for the purposes of the organisation's Disciplinary Policy and Procedures and may constitute gross misconduct for which summary dismissal is the sanction.

While the organisation hopes that such disclosures will never be necessary, it also recognises that it may find itself in circumstances which are new to it. Each case will be treated on its own facts.

## ***Modern Slavery / Human Trafficking***

We have created Modern Slavery Act Risk Assessment of our suppliers checking for Modern Slavery / Bribery policies in place across their supply chain.

### **Suppliers**

Any new suppliers are required to complete a supplier questionnaire which asks for compliance to the Modern Slavery Act.

Existing suppliers are checked through their policies on their website or asked to provide their policies to ensure compliance.

### **Risk Assessment**

We will assess each supplier on the importance of the products we purchase to the services we offer and their compliance to these policies. We will group suppliers based on strategic customers to analyse supply chain by customer. Any suppliers found to be non-compliant will be required to complete this process to allow us to assure our customers of compliance. This will be reviewed annually and approved by our Managing Director.

### **Staff Awareness**

A toolbox talk is delivered to all our designers / managers / directors of the consequences of Modern Slavery / Bribery Acts and lay out our control measures laid out in our Risk Assessment. This includes contacting suppliers who fail to meet these requirements. All new staff will be required to complete this toolbox talk as part of their induction process and staff who account manage and work with our supply chain will be required to complete the toolbox talk. The main items will be included in any refreshers.

### **Management Review - Control Measures and Residual Risk**

The outputs from the risk assessment will be discussed at our Annual Management Review Meetings as part of our Management Systems and seek to create objectives, targets and programmes throughout the organisation.

### **Reports**

We will produce reports of our risk assessment findings to clients if requested based on the suppliers identified in our supply chain. An example of the dashboards is shown.

