

# Anti-Bribery and Corruption Policy

It is our policy that certain principles and values must be the foundation of sound and fair business practice and must be upheld. One such principle is a **zero tolerance position in relation to bribery and corruption**, wherever and in whatever form that it may be encountered.

It is important to uphold our sound reputation for ethical behaviour, financial probity and reliability. In support of this aim we intend to limit our exposure to bribery and corruption by:

- The clear statement made by this anti-bribery & corruption policy.
- Encouraging colleagues to be vigilant and to report any suspicion of bribery ensuring sensitive information is treated appropriately.
- Rigorously investigating instances of alleged bribery.
- Taking action against any individual(s) involved in bribery or corruption.

## What is Bribery?

A bribe does not need to be actual money. It can be any form of advantage, offered, requested or received. A contract does not need to have been won for a corruption offence to have been committed. Similarly, a recipient does not need to benefit personally from a bribe – it may be the intended beneficiary is a third party or a company. Finally, bribery can occur in the private as well as the public sector – it is not just about our relationship with public officials.

## Policy

Details of this policy can be found on in our Company Handbook. The policy has two straightforward rules that all colleagues, consultants and agents must adhere strictly to:

- Do not offer, promise or pay bribes
- Do not request, agree to or accept bribes

This policy applies to individual employees, customers, suppliers or any other people or bodies associated with the company.

## Report concerns - employee responsibility

The prevention, detection and reporting of bribery is the responsibility of all colleagues. Suitable channels of communication by which employees or others can report confidentially any suspicion of bribery will be maintained. Colleagues who are suspected of involvement in bribery or corruption will be subject to investigation and may face disciplinary action if established that this policy has been breached.

**Approved By :** Mr RA Rowan

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