

# Anti-fraud, Bribery and Corruption Policy

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## 1. POLICY STATEMENT

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1. It is our policy to conduct all our business in an honest and ethical manner. We take a approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships and implementing and enforcing effective systems to counter bribery.

1.2 We will uphold all laws relevant to countering bribery and corruption.

## 2. WHO IS COVERED BY THE POLICY?

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2. This policy applies to all individuals working at all levels within the company, including senior managers, directors, consultants, contractors, trainees, casual workers and agency staff, or any other person associated with us, or their employees, wherever located.

## 3. WHAT IS BRIBERY?

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3. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

Examples:

- Offering a bribe

You offer a potential client tickets to a major sporting event, but only if they agree to do business with us.

This would be an offence as you are making the offer to gain a commercial and contractual advantage. We may also be found to have committed an offence because the offer has been made to obtain business for us. It may also be an offence for the potential client to accept your offer.

- Receiving a bribe

A supplier gives your nephew a job, but makes it clear that in return they expect you to use your influence in our organisation to ensure we continue to do business with them.

It is an offence for a supplier to make such an offer. It would be an offence for you to accept the offer as you would be doing so to gain a personal advantage.

- Bribing a foreign official

You arrange for the business to pay an additional payment to a foreign official to speed up an administrative process.

The offence of bribing a foreign public official has been committed as soon as the offer is made. This is because it is made to gain a business advantage for the Company. You may also be found to have committed an offence.

## 4. GIFTS AND HOSPITALITY

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4. This policy does not prohibit normal and appropriate hospitality given or received.

4.1 The giving or receipt of gifts is not prohibited if all of the following requirements are met:

4.2 It is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;

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4.3 It complies with local law;

4.4 It does not include cash;

4.5 Taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time e.g. a small gift at Christmas

4.6 It is given openly, not secretly; and

4.7 Gifts should not be offered to, or accepted from, government officials, politicians or political parties without the prior approval of your manager.

## 5. WHAT IS NOT ACCEPTABLE?

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5 It is not acceptable for you (or someone on your behalf) to:

5.1 Give or offer a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;

5.2 Give or offer a payment, gift or hospitality to a government official, agent or representative to facilitate or expedite a procedure;

5.3 Accept a payment, gift or hospitality from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them; or

5.4 Threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy.

## 6. FACILITATION PAYMENTS AND KICKBACKS

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6. We do not make, and will not accept, facilitation payments or kickbacks of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. Kickbacks are typically payments made in return for a business favour or advantage.

6.1 If you are asked to make a payment on the Company's behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt which details the reason for the payment. If you have any suspicions, concerns or queries regarding a payment, you should raise these with your line manager.

6.2 You must avoid any activity that might lead to or suggest that a facilitation payment or kickback will be made or accepted by us.

## 7. YOUR RESPONSIBILITIES

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7. The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us. You must notify a Company Director as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

7.1 Any employee who breaches this policy will face disciplinary action which could result in dismissal for gross misconduct.

## 8. RECORD-KEEPING

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8. You must declare and keep a written record of all hospitality or gifts accepted or offered, which will be subject to managerial review.

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8.1 You must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with our expenses policy and specifically record the reason for the expenditure.

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

### 9. HOW TO RAISE A CONCERN

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9. You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries, these should be raised with your line manager.

### 10. WHAT TO DO IF YOU ARE A VICTIM OF BRIBERY OR CORRUPTION

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10. It is important that you tell a Company Director as soon as possible if you are offered a bribe by a third party or are asked to make one.

### 11. PROTECTION

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11. We encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

11.1 We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicions about bribery or corruption activity. If you believe that you have suffered any such treatment, you should inform an appropriate manager immediately. If the matter is not remedied, you should raise it formally using our grievance procedure.

### 12. TRAINING AND COMMUNICATION

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12. Training on this policy forms part of the induction process for all new workers. All existing workers will receive regular, relevant training on how to implement and adhere to this policy.

12.1 Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.