

# Bribery & Corruption Policy

The group has a clear policy on bribery and corruption and we support our employees to make decisions in line with our stated position. Our conduct is based on our commitment to acting professionally, fairly and with integrity. The group does not tolerate any form of bribery and corruption in any of our business dealings.

This policy applies to all the groups employees (staff, contract and temporary).

We will comply with the Bribery Act 2010 in respect of our conduct both at home and abroad. We also comply with laws relevant to countering bribery and corruption in the countries in which we operate.

The purpose of this policy is to set out our responsibilities, and the responsibilities of those working for us and to provide information and on how to recognise and deal with bribery and corruption issues.

#### You must understand and comply with the following:

- It is an offence to bribe another person, to be bribed, to bribe a public official and for a company to fail to prevent bribery (Bribery Act 2010).
- Fines and imprisonment can be imposed on individuals who fail to comply with the legislation.
- You must never offer, promise or give financial or other advantage to any person in order to solicit or reward improper performance by them.
- You must never accept or agree to receive financial or other favours as a reward for the improper performance of your duties.
- You must never threaten or retaliate against another person who has refused to engage in any activity that might lead to a breach of this policy.
- Where your role requires you to give and receive hospitality this should always be in a reasonable and proportionate manner. Further guidance is set out below.
- Corruption is the abuse of public or private office for personal gain.
- You must read this policy carefully and revert any questions to your line Director.

#### Gifts and hospitality:

This policy does not prohibit normal and appropriate hospitality or gifts (given and received) to or from third parties, providing:

- You have disclosed it to your line Director in advance

- It is not made with the intention of influencing, inducing or rewarding a third party in order to gain any improper advantage, favour or benefit
- It complies with local law;
- It does not include cash or a cash equivalent
- It is appropriate and is of an appropriate type and value (ie. it is customary for small gifts to be given at Christmas)
- It is given openly, not secretly;
- Gifts or hospitality should not be offered to, or accepted from, government officials or representatives

Where it is an accepted part of your role, you can offer and accept a reasonable amount of moderate hospitality for the purposes of business development (you should ask your line Director if you are unsure about this).

#### Your Responsibilities:

- You must ensure that you read, understand and comply with this policy
- You must be open about gifts and hospitality given or received and you must disclose these to your line Director in advance (where it is possible to do so, or as soon as possible afterwards).
- The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us. All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- Any employee who breaches this policy may face disciplinary action for gross misconduct.

#### Record-keeping:

Financial records and appropriate internal controls will be kept up to date, which evidence the business reason for making payments to third parties and all expenses claims relating to hospitality, gifts or expenses incurred to third parties.

The group Directors endorse this Policy and the Managing Director has overall responsibility for ensuring this policy complies with our legal and ethical obligations.

David Toon  
Managing Director

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