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Anti Bribery Policy

Employee Handbook extract | GX/DOC/041 | Issue 2, July 2024 | Pages 26–27

Introduction

The Company is committed to the highest standards of ethical conduct and integrity in its business activities and as such, we will not tolerate any form of bribery within our Organisation or directed to any person within our Organisation.

Every employee and individual acting on the organisation's behalf is responsible for maintaining the organisation's reputation and for conducting company business honestly and professionally.

The Bribery Act 2010 came into force on 1st July 2011 which made it a criminal offence to offer, promise or accept a bribe. All employees and associated persons are required to comply with this policy, in accordance with the Bribery Act 2010.

What is a bribe?

A bribe is a financial advantage or other reward that is offered to, given to, or received by an individual or company (whether directly or indirectly) to induce or influence that individual or company to perform public or corporate functions or duties improperly.

Employees and others acting for or on behalf of the organisation are strictly prohibited from making, soliciting or receiving any bribes or unauthorised payments.

As such you should not offer, promise, give, request, agree to receive, or accept any bribes:

- During the course of employment;
- When conducting company business; or
- When representing the organisation in any other capacity.

Procedure for offering or accepting gifts, hospitality etc.

Any gifts, rewards or entertainment received or offered from clients, public officials, suppliers or other business contacts should be reported immediately to your Manager.

In certain circumstances, it may not be appropriate to retain such gifts or be provided with the entertainment and employees and associated persons may be asked to return the gifts to the sender or refuse the entertainment, for example, where there could be a real or perceived conflict of interest. As a general rule, small tokens of appreciation, such as flowers or a bottle of wine, may be retained by employees.

If you wish to provide gifts to suppliers, clients or other business contacts, prior written approval must be obtained from the Manager. These will be authorised only in limited circumstances and must be proportionate, reasonable and made in good faith.

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Reporting suspected bribery

You should report any concerns that you may have to the Manager as soon as possible. Issues that should be reported include:

- any suspected or actual attempts at bribery;
- concerns that other employees or associated persons may be being bribed; or
- concerns that other employees or associated persons may be bribing third parties, such as clients or government officials.

In line with our whistle-blowing policy any person who reports instances of bribery or suspected bribery in good faith will be supported by the Company. We will take your concerns seriously and will ensure that you are not subjected to detrimental treatment as a consequence of your report. An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, you should not agree to remain silent.

Action by the company

We will fully investigate any instances of alleged or suspected bribery. Employees suspected of bribery may be suspended from their duties while the investigation is being carried out. The Company will invoke its disciplinary procedures where any employee is suspected of bribery, and proven allegations may result in a finding of gross misconduct and immediate dismissal.

Any instances of detrimental treatment by a fellow employee towards any person who raises their concerns will be treated as a disciplinary offence.

The Company may also report any matter to the relevant authorities, including the Director of Public Prosecutions, Serious Fraud Office, Revenue and Customs Prosecutions Office and the police. The Company will provide all necessary assistance to the relevant authorities in any subsequent prosecution.

Penalties.

A breach of the organisation's anti-bribery policy by an employee will be treated as grounds for disciplinary action, up to and including dismissal.

You should be aware that that bribery is a criminal offence that may result in up to 10 years' imprisonment and/or an unlimited monetary fine for the individual accepting, offering or attempting to cover up a bribe along with an unlimited fine for the organisation.

Records

Accurate, detailed and up-to-date records of all corporate hospitality, entertainment or gifts accepted or offered must be kept.

If you are offered any gift or hospitality, you should report the matter to the Manager. A record of all offers will be kept.

If you offer any gift or hospitality to any person, or organisation, you must first obtain permission from the Manager again the offer must be properly recorded.