



ANTI-BRIBERY POLICY

January 2023



Key individuals involved in developing the process and policy.

Name	Job Title
Geoff Walden	Head of Operations and Services
Nadine Searle	Group HR Business Partner

Circulated to the following individuals for comments and approval.

Name	Job Title
Tina Goodship	Head of Finance and Company Secretary
Wayne Taylor	Managing Director

Draft and issue information

Subject/Topic	Comments
Date of draft	1 st September 2017
Date sent for review	1 st September 2017
Date approved	4 th September 2017
Approved by	WT
Date of issue	1 October 2017
Date for review	Jan 2023
Where documents available and stored	Group Drive>Company Policies
Scope of policy	All Staff
Feedback on implementation and content to	Nadine Searle, Group HRBP

Version control and summary of changes.

Version Number	Date	Comments (description of change and/or amendments)
1.0	Oct 2017	Harmonise Group Policy
2.0	Jan 2020	Policy review – Only amendment is to include HR Training and Development as part of the Group.
2.0	Jan 2022	Policy Review – remove reference to HRTD
2.1	March 2022	Data Classification added
3.0	Jan 2023	Policy Review – Update to Template

CONTENTS

1.0 INTRODUCTION	4
2.0 POLICY	4
3.0 SUSPICION	4
4.0 GIFTS & HOSPITALITY	4



1.0: Introduction

1.1 Bribery is a criminal offence. The Company prohibits any form of bribery. We require compliance, from everyone connected with our business, with the highest ethical standards and anti-bribery laws applicable. Integrity and transparency are of utmost importance to us and we have a zero tolerance attitude towards corrupt activities of any kind, whether committed by employees or by third parties acting for or on behalf of the company.

2.0: Policy

2.1 It is prohibited, directly or indirectly, for any employee or person working on our behalf to offer, give, request or accept any bribe i.e. gift, loan, payment, reward or advantage, either in cash or any other form of inducement, to or from any person or Company in order to gain a commercial, contractual or regulatory advantage for the Company, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.

3.0: Suspicion

3.1 If we suspect that you have committed an act of bribery or attempted bribery, an investigation will be carried out and, in line with our disciplinary procedure where appropriate, action may be taken against you which may result in your dismissal, or the cessation of our business arrangement with you.

3.2 If you, as an employee or person working on our behalf, suspect that an act of bribery or attempted bribery has taken place, even if you are not personally involved, you are expected to report this to your Line Manager or the Managing Director. You may be asked to give a written account of events. Staff are reminded of the Company's Whistleblowing Policy which is available in the company handbook (see section 15).

4.0: Gifts & Hospitality

4.1 We realise the giving and receiving of gifts and hospitality as a reflection of friendship or appreciation where nothing is expected in return may occur, or even be commonplace, in our industry. This does not constitute bribery where it is proportionate.

4.2 No gift should be given nor hospitality offered by an employee or anyone working on our behalf to any party in connection with our business without receiving prior approval from your Line Manager.

Signed:



Date: 03/01/2023

Wayne Taylor
(Managing Director)