Anti- Bribery Statement

Policy Statement

The Company is committed to the prevention of bribery by those employed and associated with it and is committed to carrying out its business fairly, honestly, and openly, with zero tolerance towards bribery.

All employees have a responsibility to prevent, detect and report all instances of bribery.

Procedure

The Company will:

- Carry out a risk assessment to ascertain the risk of bribery
- Instigate procedures proportionate to that risk
- Have good internal controls and record-keeping
- Secure the commitment of all employees to the prevention and detection of bribery
- Develop a culture in which bribery is unacceptable
- Undertake due diligence procedures proportionate to the assessed risk of bribery
- Effectively communicate the Anti-Bribery Policy to all employees
- Train all employees to recognise bribery so that they can avoid it and be alert to possible instances of bribery
- Monitor and review the effectiveness of the bribery procedures and update them as necessary to ensure that they remain effective

Anyone who has concerns regarding acts or potential acts of bribery should speak to their Manager in the first instance. If for any reason you are not able to speak to your Manager, you should contact the Managing Director.

All reports will be treated in confidence, however, if appropriate concerns can be reported anonymously.

The Company expressly prohibits employees from offering, promising, giving, or requesting, agreeing to receive or receiving any financial or other advantage to another person or business with the intention of gaining an improper financial or other advantage.

The Company expressly prohibits the bribing of a UK or foreign public official in order to obtain or retain business or an advantage in the conduct of business.

Hospitality and Business Gifts

Reasonable and proportionate hospitality, advertising, sponsorship, and promotional or other similar business expenditure is recognised as an established and important part of doing business. However, hospitality, promotional, and similar business expenditure can be used as bribes.

The Company expressly prohibits the giving and receiving of hospitality or business gifts and similar where the intention in doing so is to receive or confer an advantage in return for giving or receiving the hospitality or business gift or similar.

The following rules must be followed in relation to hospitality and business gifts:

- All offers of business gifts should be referred to and agreed to by the Managing Director
- Business gifts should not be made without the permission of the Managing Director
- A record of all business gifts made and received and the reason for the gift should be retained
- All hospitality must be proportionate and reasonable and in line with the Company's hospitality policy; guidance should be sought from the Managing Director as to whether the planned hospitality is proportionate and reasonable
- Records should be maintained of all hospitality provided and accepted, including cost and reason for providing or accepting the hospitality
- Quid pro quo arrangements are expressly prohibited
- Cash gifts are expressly prohibited
- The provision or acceptance of entertainment of a sexual nature is expressly prohibited
- Acceptable hospitality and entertaining may include modest meals with people with whom the Company do business with, such as providing a modest lunch after a meeting, or the occasional provision of or attendance at sporting or cultural events, provided that the intention is to build business relationships rather than to receive or confer an advantage
- The provision of small promotional gifts, such as diaries, pens or similar, will generally be regarded as acceptable
- Employees reviewing expense claims should be alert to the provision of hospitality or business gifts that may be construed as a bribe
- All concerns should be reported

Where you develop or seek to develop new avenues for business or new contracts, or where the nature of the business changes, you should inform your Manager of this in order that due diligence and a risk assessment of the circumstances can be undertaken.

Where a business relationship with an external party is sought or newly established, or the nature of the relationship is changed, appropriate due diligence must be exercised to ensure that there are no circumstances giving rise to a concern. That external party must also be made aware of this Anti-Bribery Policy.

The Company expressly prohibits facilitation payments of any sort. Any employee placed under pressure to make a facilitation payment should refer the matter to the Managing Director immediately.

The Company expressly prohibits the giving of donations to political parties. Any charitable donation must be consistent with the Company's policy on charitable giving and with the knowledge and consent of the Managing Director.

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Penalties

The penalties for breaching the provisions of the Bribery Act 2010 include unlimited fines for the Company, imprisonment and unlimited fines for individuals.

Failure to follow these procedures may result in formal disciplinary action being taken against you, as set out in our Disciplinary Procedure.