

## Anti-Corruption and Bribery Policy

### Policy and Principles

It is our policy to conduct all of our business in a honest and ethical manner. We take a zero – tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business. We will uphold all laws relevant to countering bribery and corruption, however we remain bound by the laws of the UK, including Bribery Act 2010, in respect of our conduct both at home and abroad.

### Purpose of the Policy

- Set out our responsibilities and of those working for us, in observing and upholding our position on bribery and corruption.
- Provide information and guidance to this working for us on how to recognise and deal with bribery and corruption issues.

### Who is covered by the policy

The policy applies to all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed term or temporary) consultants, contractors, agency staff, volunteers or any person associated with us.

### What is bribery

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

### Gifts and Hospitality

This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties. The giving or receipt of gifts is not prohibited ( subject to the provisions of our standard contract employment), If the following requirements are met.

- It's not made with the intention of influencing a third party to obtain or retain business of a business advantage or to reward the provision or retention of business or business advantage.
- It complies with local law
- Its given in our name not your name
- It does not include cash or cash equivalents.

- It is appropriate in the circumstances (i.e small gift and Christmas)
- Taking into account the reason for the gift
- It is given openly and not secretly
- Gifts should not be offered to or be accepted from a government official.

### What is not acceptable

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

- Give, promise to give, or offer a payment, gift or hospitality with the exception or hope that business advantage will be received.
- Engage in activity that might lead to a breach of this policy
- Accept payment from third parties that you know or suspect is offered with the expectation that will obtain a business advantage.

### Donations

We do not make contributions to political parties. We only make charitable donations that are legal and ethical under local laws and practices. No donations are made without prior approval to the directors.

### Responsibilities

You must ensure that you need, understand and comply with this policy.

- The preventions, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control.
- You must notify you manager as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.
- Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve the right to terminate our contractual relationship with other workers.

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## How to raise a concern

You are encouraged to raise concerns about any issue or suspicion of malpractice the earliest possible stage, any issues or concerns should be raised with your manager.

## Monitoring and review

The policy will be monitored for the effectiveness and reviewed.

B Foster



Director.