

# ANTI BRIBERY POLICY

Bribery is the accepting of gifts, money, hospitality or other favours in return for providing something of value to the briber. The purpose of this policy is to set out the rules that must be followed by individuals working on our behalf in any capacity to ensure that no bribery occurs.

This policy applies to employees, contractors, external consultants, agency workers, business partners, sponsors or any other person associated with us.

## **Unacceptable behaviour**

The following behaviour is unacceptable, and must not occur when working on behalf of this organisation:

- accepting any financial or other reward from any person in return for providing some favour;
- requesting a financial or other reward from any person in return for providing some favour;
- offering any financial or other reward from any person in return for providing some favour.

## **Business gifts**

From time to time, customers, suppliers or other persons might offer a gift to someone who is working on our behalf. This could be a small item, or something of considerable value. All gifts, however small, must be reported to a Director and recorded. If a gift is offered and then refused because of its value, this must be reported to a Director.

## **Hospitality**

From time to time, customers, suppliers or other persons might invite someone who is working on our behalf to a hospitality event. All such invitations must be reported to a Director. Permission must be given by the Director before an individual accepts any invitation.

## **Offering gifts and hospitality**

The organisation may offer small gifts (eg pens, diaries) to customers, suppliers and other persons. If a gift is authorised by a Director the person working on our behalf is entitled to give it to the appropriate individuals. A record must be kept of all gifts.

This organisation occasionally runs hospitality events, primarily aimed at thanking customers and suppliers for their custom and loyalty. An individual working on behalf of the organisation must not organise any hospitality event without seeking authority from his or her Director.

## **Responsibilities of the Director**

Directors are responsible for keeping a record of all gifts and hospitality that are offered and/or received by any individual working in the Director's area of responsibility. If a Director is concerned about any actions, they should contact the Managing Director immediately for advice.

Directors are also responsible for ensuring that all individuals working on our behalf are aware of this policy, and fully understand the rules in relation to the acceptance of gifts and hospitality.

**Attempts to bribe**

An individual who is concerned that he or she is potentially being bribed whilst working on behalf of the organisation should report this matter to his or her Director immediately.

**Donations to organisations**

The organisation does make donations to charity. These are managed by the Managing Director. No person associated with the organisation should make donations to a charity on behalf of the organisation without approval of this manager.

No donations should be made to charities, political parties or other organisations with the intention of gaining a business advantage.

**Raising concerns**

If anyone working on our behalf is concerned that acts of bribery are occurring in the organisation they should inform their Director in the first instance. If this course of action is inappropriate, the employee should inform the Managing Director.