

Anti-Bribery Policy

The purpose of this policy is to:

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

What is bribery?

Bribery is the most common form of corruption. Bribery involves the offering, giving, receiving or soliciting of money, a gift or other financial advantage as an inducement to do something that is improper, illegal or a breach of trust during doing business. This includes any payment through a third party and a recipient acting or failing to act in anticipation of receiving a financial or other advantage.

Who is covered by the policy?

This policy applies to all individuals working at all levels including directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, casual workers and agency staff or any other person associated with us, wherever located (collectively referred to as workers in this policy).

Gifts

The giving or receipt of gifts is not prohibited if the following requirements are met:

- It is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
- It is not an unlawful gift;
- It is given in our name, not in your name;
- It does not include cash or a cash equivalent (such as gifts certificates or vouchers);
- It is appropriate in the circumstances (for example, small gifts given at Christmas time);
- Considering the reason for the gift, it is of an appropriate type and value and given at an appropriate time;
- It is given openly, not secretly.

We appreciate that the practice of giving business gifts varies. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift should always be considered. If you are at all unclear about the appropriateness of a gift, please speak to the Finance Controller in the first instance.

Hospitality

This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties, provided it falls within reasonable bounds of value and occurrence. Although no two situations are ever the same, it is possible to identify suitable indicators which will help us to evaluate what would be considered acceptable:

- What is the intent behind the hospitality – is it to build a relationship or is it something else?
- How would it look if details of the hospitality were made public? Would we feel embarrassed?
- What if the situation were reversed – would there be a double standard?

All instances of hospitality (given and received) must be reported to the Finance Controller prior to any invitation being accepted or offered. The Finance Controller will review each instance, confirm whether it falls in line with this policy and record the occurrence.

What is not acceptable?

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

- give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- accept payment from a third party that you know, or suspect is offered with the expectation that it will obtain a business advantage for them;
- accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return.

Your responsibilities

You must ensure that you read, understand and comply, with this policy, always. The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify the Finance Controller as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future. For example, if a third party offers you something to gain a business advantage with us or indicates to you that a gift or payment is required to secure their business.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with other workers if they breach this policy.

How to raise a concern

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether an act constitutes bribery or corruption, or if you have any other queries, these should be raised with the Finance Controller. Concerns should be reported via the same method.

What to do if you are a victim of bribery or corruption

It is important that you tell the Finance Controller as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

Protection

Workers who refuse to accept or offer a bribe, or those who raise concerns or report another's wrong doing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

We are committed to ensuring no one suffers any detrimental treatment because of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Finance Controller immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be provided through contact with the HR department.

Who is responsible for the policy?

The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. The Finance Controller has primary and day-to-day responsibility for implementing this policy, and for monitoring its use and effectiveness and dealing with any queries on its interpretation. Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

Monitoring and review

The Finance Controller will monitor the effectiveness and review the implementation of this policy regularly, considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.



Ray Heathman
Chairman

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