

ANTI-CORRUPTION AND BRIBERY POLICY

1. ABOUT THIS POLICY

It is our policy to conduct all of our business in an 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 dealings and relationships.

We remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both at home and abroad.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. Any non-employee who breaches this policy may have their contract terminated with immediate effect.

This policy will be amended to remain up to date with current legislation.

2. WHO MUST COMPLY WITH THIS POLICY?

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

3. WHAT IS BRIBERY?

Bribe means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit.

Bribery includes offering, promising, giving, accepting or seeking a bribe.

All forms of bribery are strictly prohibited. If you are unsure about whether a particular act constitutes bribery, raise it with your line manager.

Specifically, you must not:

- give or offer any payment, gift, hospitality or other benefit in the expectation that a business advantage will be received in return, or to reward any business received;
- accept any offer from a third party that you know or suspect is made with the expectation that we will provide a business advantage for them or anyone else;
- give or offer any payment (sometimes called a facilitation payment) to a government official in any country to facilitate or speed up a routine or necessary procedure;

- You must not threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.

4. GIFTS AND HOSPITALITY

This policy does not prohibit the giving or accepting of reasonable and appropriate hospitality for legitimate purposes such as building relationships, maintaining our image or reputation, or marketing our products and services.

A gift or hospitality will not be appropriate if it is unduly lavish or extravagant, or could be seen as an inducement or reward for any preferential treatment (for example, during contractual negotiations or a tender process).

Gifts must be of an appropriate type and value depending on the circumstances and taking account of the reason for the gift. Gifts must not include cash or cash equivalent (such as vouchers) or be given in secret. Gifts must be given in our name, not your name.

Promotional gifts of low value may be given to or accepted from existing customers, suppliers and business partners.

You should always consider in all circumstances is the gift or hospitality reasonable and justifiable. You should always consider the intention behind the gift or offer of hospitality.

5. WHAT IS NOT ACCEPTABLE?

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

- engage in any action or activity that is a breach of this policy;
- give, or promise to give, or offer, a payment, gift or hospitality with the expectation or hope that you will receive a business advantage, or as a reward to one already given;
- accept a payment from a third party that you know or suspect is offering it with an expectation that a business advantage will be given;
- give, or promise to give, or offer, a payment, gift or hospitality to a government official, representative or agent to assist or expedite a practice or procedure;
- threaten or take action against another person who has refused to commit a bribery offence or who has raised a concern.

6. HOW TO RAISE A CONCERN

If you are offered a bribe, or are asked to make one, or if you suspect that any bribery, corruption or other breach of this policy has occurred or may occur, you must notify your line manager or the UK Managing Director as soon as possible.

You will receive no detrimental treatment if you raise a genuine concern.

7. YOUR RESPONSIBILITY

- You must ensure you read and understand this policy.
- It is your responsibility to ensure that anyone working for you or as part of your team is aware of this policy.
- You must notify the UK Managing Director or your line manager if you believe a breach has occurred or there is a potential it may happen.
- You are aware that any breaches of this policy could lead to disciplinary action and may result in dismissal for gross misconduct if proven.

If you have any questions or need clarification regarding this policy please contact your line manager in the first instance.