

Anti-Bribery and Corruption Policy

Document Owner	Version	Classification Confidential (Co) Private (Pr) Public (Pu)	Latest Revision Date	Details of Revision	Date of Next Review (max 24 months)
People Team Director	1	Pu	15.06.23	New Document	15.06.25

Scope:

Who does this document affect?

Objective:

What should this process achieve?

Responsibilities:

Employees – have a personal responsibility and are required to read and understand all aspects of this policy and abide by it.

Line Managers - have a responsibility for their own actions and that of their teams. • Business Directors - are responsible for their teams within their business units.

The Board– have overall responsibility and will assist each manager with continuous refreshing and reinforcing of this policy via application guidance and monitoring. It is the responsibility of the Board to ensure the detailed implementation of the anti-bribery Programme.

Standard Reference:

ISO 9001:2015 Clause 5

Definitions:

Bribery is the offering, promising, giving, accepting, or soliciting of an advantage as an inducement for an action which is illegal, unethical or a breach of trust. Inducements can take the form of gifts, loans, fees, rewards, or other advantages (taxes, services, donations, etc.). Bribes can take on many different shapes and forms, but typically they involve corrupt intent.

Corruption is the abuse of entrusted power for private gain. Corruption can be classified as grand, petty, and political, depending on the amounts of money lost and the sector where it occurs. Acts of bribery or corruption are designed to influence the individual in the performance of their duty and incline them to act dishonestly.

Policy:

It is expected that all associated persons will work with integrity and follow the Company ethical code of conduct at all times.

The leadership team attaches the utmost importance to this policy and Anti Bribery procedure and operates a zero-tolerance approach to involvement with bribery and corruption by any of our employees or third-party representatives, whether by offering, promising, soliciting, demanding, giving or accepting bribes or behaving corruptly in the expectation of a bribe or an advantage.

It is expected by the Company that this policy will be respected and adhered to at all times by all employees and associated persons.

Any breach of this policy will be regarded as gross misconduct by the Company and is likely to result in disciplinary action and further legal action.

Penalties:

Bribery is a criminal offence and penalties can be severe. The Bribery Act 2010 not only makes bribery and corruption illegal, but also holds the employer liable for failing to prevent such acts by those working for or on its behalf, no matter in which country the act takes place.

The penalties for individuals include up to 10 years in prison and unlimited fines. Organisation's risk unlimited fines, debarment from EU contracts and the confiscation of the value of corruptly obtained contracts.

Human Resources:

The Company is committed to supporting the Bribery Programme through its policies and procedures and recognises the importance of employee involvement in the process of implementation and improvement of the Programme.

Recruitment:

The Company operates a fair and transparent recruitment process using objective criteria which is documented to ensure this. Extra due diligence will be applied when appointing senior management and employees who are more likely to be exposed to risks of bribery.

The Bribery Programme will feature in the induction process of all new employees, and the Company bribery policy will be sent to the employee on their first day along with other relevant Company policies. New employees will also be informed of the appropriate communication channels for advice and reporting of any suspected acts of bribery

Adherence to the policy is a condition of employment and forms part of the contract of employment.

Awareness and understanding:

The Company recognises the need for appropriate and continual awareness and understanding of the issue of bribery and its management in order to obtain the commitment of directors and employees to the Programme. Regular communication will be provided to ensure staff are able to work with integrity and to provide them with the knowledge needed to deal with situations if and when they occur.

Communication will be issued in accordance with risk assessments carried out and will be evaluated to ensure its effectiveness.

From time to time, where reasonable and appropriate, the Company may require contractors and suppliers to participate in Company anti-bribery training courses to understand the Programme and to provide confirmation that they will follow these in all their dealings with the company.

Recording and sanctions:

All breaches of this policy will be documented, however minor or severe. The Company will not tolerate breaches of this Anti Bribery policy and procedure. Any violations of the Programme may lead to disciplinary action against the employee or further legal action.

Risk assessment:

The Company adopts a continuous process of internal and external risk assessment in order that the Anti Bribery policy and procedure meets changing conditions and risks. Regular reports will be produced and given to the Board of Directors who are responsible for the oversight of the Risk Assessment process.

Before entering into any business relationship or project, the Company will carry out due diligence on the client and/or country in which the business is to be conducted, on any potential business partners, agents used and on the proposed project or business transaction in order to identify as far as reasonably possible the risk of corruption.

All risk assessments will be correctly documented, and conclusions included in the Board Agenda.

Control objectives

The Company operates in compliance with the laws relevant to countering bribery and corruption in all jurisdictions where the company operates. These include but are not limited to the Bribery Act 2010 and the Foreign Corrupt Practices Act (FCPA).

Wherever possible, the Company will use procurement and contract management procedures which minimise the opportunity for corruption by sub-contractors and suppliers against the company. The Company is committed to ensuring that its partners, suppliers, contractors,

agents and other third parties with which we do business, have in place a code of conduct which explicitly prohibits the making of corrupt payments.

Contracting and purchasing:

The Company is thorough in ensuring that the Anti Bribery policy is communicated to and endorsed by all contractors and suppliers.

Again, to demonstrate our policies and operations are free from bribery, the Company is open and transparent about the process by which contracts of major interest to stakeholders have been notified, opened to potential bidders and awarded. Unsuccessful bidders will be notified of decisions made the basis for selecting winning contracts.

The Company's purchasing and contract processes has been designed to remove any opportunity for employees to distort the process to create ways in which they can steer the award of a contract to a particular bidder.

Communication channels:

The Company provides regular opportunities for employees to engage in free and open discussion of the Anti-Bribery policy and procedure and potential or likely risks of abuse or non-conformance.

The company operates a whistle blowing channel for employees, business partners, third parties and any other associated persons in order to provide support, somewhere for complaints to be logged and for guidance to be sought.

The Company ensures adequate protection is available to anyone using the service and conforms to local law in this respect. All concerns raised are documented and filed and the handling and outcome is put into a report which is given to the Board of Directors to review.

Auditing:

Regular auditing of the Company's internal controls is carried out to provide reasonable assurance that payments and receipts are properly authorised by management and ultimately by the board.

Dealing with incidents:

8.26. ALL incidents, however minor or severe will be communicated with the Board. The persons reporting the incident and the persons subject to investigation will be given the necessary confidentiality and legal advice. If an employee suspects an act of bribery, they should follow the instructions provided in the Company Whistle Blowing policy to report this to the most appropriate person.

In the event that an incident of bribery is reported, an appropriate, impartial Senior Manager will be responsible for the investigation of the alleged bribery. Should the incident be more serious, external advice and support will also be called upon to aid the process.

Monitoring:

In order to ensure our Anti Bribery policy and procedure remains effective and for improvements to be made, it will be under continuous review.

It will be the responsibility of Finance and HR to monitor and review this policy and procedure.

Employee feedback will also be welcomed during times of evaluation in order to gain insight into the policy's effectiveness and to make improvements if and where needed.