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1. Purpose

- 1.1 <<Company Name>> is committed to the practice of responsible corporate governance, complying with all laws, regulations and other requirements in the conduct of our operations.
- 1.2 The Company is fully committed to having a strong anti-corruption culture and is fully committed to complying with all anti-bribery and anti-corruption legislation including the UK Bribery Act 2010 ("the Act") and ensures that no bribes, gifts, payments, inducements or similar are made, offered, sought or received by anyone working on our behalf.

2. Bribery

- 2.1 Bribery is defined as the offering of a financial or other advantage to another party who is intended to induce the other party to perform a particular function or service, or to reward them for the same, or where the acceptance of such advantage amounts to itself improper conduct.
- 2.2 Bribery is also deemed to be the request or agreement where a party requests or agrees to receive a financial or other advantage from another party where that advantage is intended to induce the other party to perform a particular function improperly, where the acceptance of such advantage amounts to itself improper conduct, or where that party acts improperly in the acceptance of such advantage.
- 2.3 Bribery of a foreign official is the giving or promising of a financial or other advantage to a foreign official in order to obtain business or an advantage from that official unless the foreign official is required or permitted to accept such advantage.

3. Consequences of Bribery

- 3.1 Anyone or any organisation who is found to be in breach of bribery under the Act may face fines and/or prison and may also incur legal costs and adverse publicity which are likely to result from such findings.
- 3.2 For employees of the Company, failure to comply with this Policy and/or with the Act may result in disciplinary action, which may result in a fine and/or imprisonment.
 - 3.2.1 disciplinary action, which may result in a fine and/or imprisonment;
 - 3.2.2 criminal penalties, which may result in a fine and/or imprisonment;
- 3.3 For the Company, any breach of the Act by any employee or business associate may result in disciplinary action, which may result in a fine and/or imprisonment.
 - 3.3.1 the Company may be fined;
 - 3.3.2 the Company may be imprisoned;
 - 3.3.3 the Company may be fined and/or imprisoned and may also incur legal costs and adverse publicity and further associated damage as a result of such findings.

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4. Responsibility for Compliance Policy

- 4.1 This Policy applies to the Company, its directors, officers, employees, agents, contractors, subcontractors, consultants, business partners, joint venture partners, and other parties (including individuals, partnerships and bodies corporate) who are associated with the Company or any of its subsidiaries.
- 4.2 It is the responsibility of the parties mentioned above to ensure that bribery is prevented and all such reports should be made in accordance with the Company's Whistleblowing Policy or as otherwise stated in the Policy.
- 4.3 No party described in this section shall:
 - 4.3.1 give or promise to give or use a third party to give or promise to give an improper advantage to another party (or to the Company's behalf where that party is acting on behalf of another party to perform a particular function or to obtain a particular result) for the same, or where the acceptance of that advantage would itself constitute improper conduct;
 - 4.3.2 request or accept from another party an improper advantage or performance of a particular function or to obtain a particular result, where the acceptance of that advantage would constitute improper conduct, or where the anticipation of such an advantage would constitute improper conduct.
- 4.4 Parties described in this section shall:
 - 4.4.1 be aware of and understand the bribery risks as described in this Policy and in the Whistleblowing Policy; and
 - 4.4.2 exercise due diligence when dealing with third parties on behalf of the Company;
 - 4.4.3 report any allegations of bribery to <<insert position, e.g. line manager / supervisor / other employees, their normal point of contact with the Company's Whistleblowing Policy>> otherwise in accordance with the Whistleblowing Policy.

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5. Facilitation Payments

- 5.1 A facilitation payment is a payment made to officials in order to ensure or speed up the performance of a routine or necessary functions.
- 5.2 Facilitation payments, if made, are subject to section 5.3, may not be made at any time or in any circumstances, including business customs in certain territories.
- 5.3 Facilitation or similar payments may be made in limited circumstances where your life is in danger or the life of another person. Any payment so made must be reported to <<insert position / position>> as soon as is reasonably possible.

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6. Gifts and Hospitality

- 6.1 Gifts and hospitality should be provided as part of conducting business and should be provided in accordance with the Company's Gifts and Hospitality Policy.

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Hospitality Policy.

- 6.2 Gifts and hospitality constitute a bribe and/or a conflict of interest. Care must be exercised at all times when giving or receiving a gift or hospitality on behalf of the Company.

- 6.3 The following general

6.3.1 Gifts and hospitality must not be given nor received as rewards, inducements or incentives for preferential treatment or inappropriate behaviour.

6.3.2 Neither gifts nor hospitality should be actively sought or encouraged from any party. No decision should be given that the award of any business or contract to a particular party will be in any way conditional on gifts or hospitality.

6.3.3 Cash should not be given or received as a gift under any circumstances.

6.3.4 Gifts and hospitality should be generally avoided at the discretion of the relevant parties should be generally avoided at the discretion of the relevant parties.

6.3.5 The value of gifts and hospitality, whether given or received, should be proportionate to the relationship between the parties and should not be unusually high compared to prevailing practices in our industry.

6.3.6 Certain gifts and hospitality may be in breach of this Policy and/or the Hospitality Policy. Gifts should not be accepted if refusal would cause a significant adverse impact on the Company, however the Company will donate any gifts accepted to a charity of <<insert person / position>> choice.

6.3.7 All gifts and hospitality given or received, must be recorded in the Hospitality Policy.

7. Charitable Donations

7.1 Charitable donations should only be made to registered (non-profit) charities. No donations should be made to any organisation which is not a registered charity.

7.2 All charitable donations should be recorded in <<insert register / system etc.>>.

7.3 Proof of receipt of a donation should be obtained from the recipient organisation.

7.4 Under no circumstances should donations be made in cash.

7.5 No charitable donations should be made at the request of any party where that request is not in the best interests of the Company.

8. Political Donations

8.1 The Company does not make political donations and the Company is not affiliated with any political party, political candidate, or with any other political organisation whose interests are not aligned with the Company's interests.

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8.2 Employees and other persons are not to be provided such payment or benefit by the Company and are not to enter into any transaction.

Employees are free to make personal donations and are not to be made on behalf of the Company in any form of advantage in any business transaction.

9. Due Diligence and Risks

The following issues should be considered in dealings with officials, and in all transactions, concerning third parties:

Employees should exercise care in any and all transactions, and should not be influenced by any concerns concerning third parties:

9.1 Territorial risks, particularly in a particular country;

Employees should be aware of bribery and corruption in a particular country;

9.2 Cross-border payments involving territories falling under section 9.1;

Transactions involving territories falling under section 9.1;

9.3 Requests for cash payments or unusual methods of payment;

Transactions involving high intermediaries or other unusual methods of payment;

9.4 Activities requiring permits or other formalities;

Transactions requiring any associated party to obtain permits or other formalities;

9.5 Transactions involving the export of goods;

Transactions involving the export of goods;

9.6 [<<Insert additional risks>>]

This policy has been approved & signed by:

Name: <<Insert Name>>

Position: <<Insert Position (e.g. Resources Manager)>>

Date: <<Date>>

Signature: