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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 that govern the conduct of our operations.
- 1.2 The Company is fully committed to maintaining 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, favors, 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 act, 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 offering of a financial or other advantage to a party requests or agrees to receive from another party where that advantage is intended to induce the 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 accepting 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 for the Company or its business unless the foreign official is required or permitted to accept such advantage.

## 3. Consequences of Bribery

- 3.1 Anyone or any organization who is found to be in breach of bribery under the Act may face fines and/or prison and the Company may face legal costs and adverse publicity which are likely to result from such breach.
- 3.2 For employees of the Company, a breach of this Policy and/or with the Act may result in the following consequences:
  - 3.2.1 disciplinary action up to and including dismissal; and
  - 3.2.2 criminal proceedings which may result in a fine and/or imprisonment.
- 3.3 For the Company, a breach of this Policy by any employee or business associate may result in the following consequences:
  - 3.3.1 the Company may be found in breach of the Act;
  - 3.3.2 the Company may face legal costs and
  - 3.3.3 the Company may face adverse publicity and further associated damage as a result of such breach.

#### 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 in 4.1 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 4.1 shall:
  - 4.3.1 give or promise to give, or use a third party to give, any financial or other advantage to another party (or to a third party acting on the Company's behalf where that third party is acting on behalf of another party to perform a particular function important to the Company) for the same, or where the giving of that advantage itself constitute improper conduct;
  - 4.3.2 request or accept, or use a third party to request or accept, any financial or other advantage from another party where the giving of that advantage is intended to induce the improper performance of a function important to the Company, where the acceptance of that advantage constitutes improper conduct, or where the giving or acceptance in the anticipation of such an advantage.
- 4.4 Parties described in 4.1 shall:
  - 4.4.1 be aware and understand the Company's Anti-Bribery Policy and implement it;
  - 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>> or, if non-employees, their normal point of contact with the Company, or otherwise in accordance with the Company's Whistleblowing Policy.

#### 5. Facilitation Payments

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

#### 6. Gifts and Hospitality

- 6.1 Gifts and hospitality shall be a 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 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 and 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 donation may result in a conflict of interest.

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

## 9. Due Diligence and Risks

The following issues should be taken into account in any and all transactions, dealings with officials, and

9.1 Territorial risks, particularly in a particular country;

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

9.3 Requests for cash payments through intermediaries or other unusual methods of payment;

9.4 Activities requiring permits or other formalities;

9.5 Transactions involving the movement of goods;

9.6 [ <<Insert additional

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9.6 [ <<Insert additional

**This policy has been approved &**

**Name:** <<Insert

**Position:** <<Insert Resources Manager>>

**Date:** <<Date>>

**Signature:**