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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, and to the highest standard of 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 Bribery Act 2010 (“the Act”) and ensures that no bribes, gifts, 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 which is intended to induce the other party to perform a particular function or to reward them for the same, or where the acceptance of that advantage is itself improper conduct.
- 2.2 Bribery is also deemed to be the offering of a financial or other advantage to a party where that party requests or agrees to receive that advantage from another party where that advantage is intended to induce the other party to perform a particular function improperly, where the acceptance of that advantage is itself improper conduct, or where that party acts improperly in accepting that 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 guilty of bribery under the Act may face fines and/or imprisonment. Such consequences may result in legal costs and adverse publicity for the Company.
- 3.2 For employees of the Company, failure to comply with this Policy and/or with the Act may result in:
  - 3.2.1 disciplinary action, including dismissal; and
  - 3.2.2 criminal proceedings, which may result in a fine and/or imprisonment.
- 3.3 For the Company, any breach of this Policy by any employee or business associate may result in:
  - 3.3.1 the Company being found guilty of a breach of the Act;
  - 3.3.2 the Company being fined and/or imprisoned;
  - 3.3.3 the Company suffering reputational damage and publicity and further associated consequences.

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**4. Responsibility for Compliance Policy**

4.1 This Policy applies to employees, consultants, business partners, partnerships and business subsidiaries.

agents, contractors, subcontractors, and other parties (including individuals, contractors, subcontractors, suppliers, and other parties) engaged with the Company or any of its subsidiaries.

4.2 It is the responsibility of all parties mentioned 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 this Policy.

mentioned parties 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 this 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 in connection with a business function important to the Company's operations; or

offer or promise to offer an improper advantage to another party (or use a third party to offer an improper advantage) on the Company's behalf where that party is intended to perform a particular function for the same, or where the offer or promise itself constitute improper conduct;

4.3.2 request or promise to request another party to perform a function where an improper advantage will be given to the recipient in connection with the function.

offer or promise to offer a financial or other advantage from which an improper advantage is intended to induce the improper conduct, where the acceptance of that advantage constitutes improper conduct, or where the anticipation of such an advantage.

4.4 Parties described in this section shall:

4.4.1 be aware of and understand the Company's Bribery Policy and its implications;

be aware of and understand the bribery risks as described in this section 9 below;

4.4.2 exercise due diligence on behalf of the Company when dealing with third parties on whom the Company is dependent;

exercise due diligence when dealing with third parties on whom the Company is dependent;

4.4.3 report any allegations of bribery to <<insert position, e.g. line manager, compliance officer, or other person in the line of management>> or contact with the Company's 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 routine or necessary functions.

payment made to officials in order to ensure or speed up the performance of routine or necessary functions.

5.2 Facilitation payments may be made at any time and in any territories.

Facilitation payments may be made subject to section 5.3, may not be made where prohibited by local business customs in certain territories.

5.3 Facilitation or similar payments may be made in limited circumstances where your life is in danger or where a payment so made must be reported 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 should be exercised at all times when giving or receiving a gift or hospitality on behalf of the Company.
- 6.3 The following general principles apply:
  - 6.3.1 Gifts and hospitality should not be given nor received as rewards, inducements or incentives for preferential treatment or inappropriate business transactions.
  - 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 transaction or similar 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 if they are not being tendered or awarded.
  - 6.3.5 The value of gifts and hospitality, whether given or received, should be proportionate to the business relationship to which they relate and should not be unusually high or excessive when 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 in breach of the Hospitality Policy to a charity of <<insert person / organisation name>> if appropriate.
  - 6.3.7 All gifts and hospitality given or received, must be recorded in the Hospitality Policy register.

**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 name>>.
- 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 party has a financial interest in the donation may result.

**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 in the Company's political.

8.2 Employees and other persons provided such payments to the Company and are not in a transaction.

be free to make personal donations and to be made on behalf of the Company in any form of advantage in any business

## 9. Due Diligence and Risks

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

concerning third parties:

- 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 transport of goods;
- 9.6 [ <<Insert additional

of bribery and corruption in a particular country;

involving territories falling under section 9.1;

through intermediaries or other unusual methods of payment;

for any associated party to obtain permits or other formalities;

of goods;

**This policy has been approved & signed by:**

**Name:** <<Insert Name>>  
**Position:** <<Insert Position>>  
**Date:** <<Date>>  
**Signature:**

Resources Manager>>