

## **Anti Bribery and Corruption Policy**

1. 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 wherever we operate.
2. It is our best practice objective that those we do business with a similar zero tolerance approach to bribery and corruption.
3. We are bound by the laws of the UK including the Bribery Act 2010, in respect of our conduct both at home and abroad. We must also comply with laws relevant to countering bribery and corruption in the jurisdictions in which we operate.
4. Bribery and corruption are criminal offences and are punishable for individuals by up to 10 years imprisonment and an unlimited fine, and if the Company is found to have taken part in corruption we could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation. We therefore take our legal responsibilities very seriously and expect you and our clients to do the same.
5. "third party" means any individual or organisation you come into contact with during the course of your work for us, and includes actual and potential customer, suppliers, distributors, business contacts, agents, advisers, government and public bodies, including their advisors, representatives and officials, politicians and political parties.
6. Management and senior staff at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy.
7. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage through "improper performance". "Improper Performance" happens when a person fails to act (1) in good faith (2) impartially or (3) in accordance with a position of trust.
8. This policy does not prohibit normal or appropriate hospitality (given and received) to or from third parties.
9. The giving or receipt of gifts and hospitality is not prohibited, if the following requirements are met:
  - You have disclosed it to your line manager in advance (where it is possible to do so, or as soon as possible afterwards)

- It is not made with the intention of influencing, inducing or rewarding a third party in order to gain any advantage through improper performance, or in explicit or implicit exchange for favours or benefits.
  - It complies with local law
  - It is given in our name, not in your name
  - It does not include cash or a cash equivalent (such as gift certificates or vouchers)
  - It is appropriate in the circumstances, for example in the UK it is customary for small gifts to be given and Christmas time
  - Taking into account the reason for the gift, it is appropriate type and value and given at an appropriate time. For example, customers are unlikely to be able to accept hospitality from us if we are participating in a tender process with them.
10. You must ensure you read, understand and comply with this policy at all times. You must be open about gifts and hospitality given or received and you must disclose these to your line manager in( where it is possible to do so, or as soon as possible afterwards) The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us under our control. All workers are required to avoid any activity that might lead to, or suggest a breach of this policy. You must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

*PJ MacSweeney*

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