



Ethics and Anti-Bribery Policy

The Bribery Act 2010 makes it an offence to offer, promise or give a bribe. It is also an offence to request, agree to receive or accept a bribe.

A bribe is a financial or other advantage offered or requested with the intention of inducing or rewarding improper performance of a relevant function or activity. It also applies where you know or believe that acceptance would constitute improper performance of a function or activity.

It is our policy to conduct our business in an open, honest, and transparent way. We do not condone the use of corrupt practices or acts of bribery to obtain an unfair advantage. We adhere to the highest ethical standards and this is reflected in every aspect of the way in which we operate.

We must be alerted to attempts to engage in/facilitate bribery. This is especially relevant to those procuring goods or services or dealing with third parties on our behalf. For instance, we may be offered excessive hospitality or gifts to facilitate business dealings. We must not accept any inducement designed to influence the way we conduct our business.

Do not accept gifts from customers, suppliers, any other person or organisation with whom we do (or might develop) business. This avoids any misunderstandings or allegations of impropriety. It is important we do not act inconsistently with our standards or, however inadvertently, impugn our integrity. Accepting a gift which influences or seems to influence our actions or decisions on our behalf may do this.

We must not accept money, gifts or other rewards from clients, suppliers etc contrary to our normal practices. Do not accept inappropriate levels of hospitality. Accepting lunch may be acceptable. Accepting a free holiday will not. If unsure, check first with your line manager.

We may accept small, genuine tokens of appreciation or gratitude which are commensurate with common practice in our company. They must be proportionate and reasonable, and we must declare them to company management. We must not treat the person/organisation that provides such gift more favourably than other clients/suppliers, etc. If unsure, check first with company management.

This policy does not apply to promotional items such as stationery or pens with a logo or company name. This is always provided the items have no significant value.

We are committed to this policy and take a "zero tolerance" approach to any act of bribery or corruption by a member of staff. We view breaches as serious misconduct which, following investigation, may lead to disciplinary action. The penalty may include summary dismissal where we believe gross misconduct has taken place.

Alison Brown

Managing Director
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