



PART 1 - GENERAL POLICY STATEMENT

The Bribery Act 2010 creates a new offence which can be committed by commercial organisations which fail to prevent persons associated with them from committing bribery on their behalf.

It is a defence for an organisation to prove that despite a particular case of bribery it nevertheless had adequate procedures in place to prevent persons associated with it from bribing.

In the foreword to the guidance published by the Ministry of Justice, the Secretary of State for Justice writes:

Bribery blights lives. Its immediate victims include firms that lose out unfairly. The wider victims are government and society, undermined by a weakened rule of law and damaged social and economic development. At stake is the principle of fair and free competition, which stands diminished by each bribe offered or accepted. Tackling this scourge is a priority for anyone who cares about the future of business.

We fully support and endorse these comments.

The Bribery Act contains two general offences covering the offering, promising or giving of a bribe (active bribery) and the requesting, agreeing to receive or accepting of a bribe (passive bribery) as sections 1 and 2 respectively. It also sets out two further offences which specifically address commercial bribery. Section 6 creates an offence relating to bribery of a foreign official in order to obtain or retain business or an advantage in the conduct of business, and section 7 creates a new form of corporate liability for failing to prevent bribery on behalf of a commercial organisation.

The purpose of this policy is to prevent bribery by persons employed by or associated with the Company.

This policy will be kept up to date, and reviewed annually or following relevant legislative or organisational changes.

Overall and final responsibility for bribery prevention in the Company is that of the Operations Director.

PART 2 – BRIBERY PREVENTION PROCEDURES

Operations Director's Responsibilities

The Operations Director's duties include the following:

- responsibility for the publication and updating of the Company's bribery prevention policy;
- ensuring the Company promotes a positive, proactive culture towards bribery prevention throughout the Company;
- ensuring that effective communication is in place throughout the Company regarding bribery prevention issues.



Employees' and Partners' Responsibilities

All employees, directors and partners must:

- take responsibility for bribery prevention when dealing with clients, suppliers and intermediaries;
- consider whether the clients, suppliers and intermediaries with whom they deal are at risk of being involved in bribery; in particular care should be taken where a client, supplier or intermediary is based in or operates in a market where bribery is known to be commonplace or where contact with a foreign public official is involved;
- report any concerns as to bribery to the Operations Director immediately on such concern arising;
- comply with all requirements specified by the Operations Director to prevent bribery.

PART 3 – HOSPITALITY

The guidance issued by the Ministry of Justice makes it clear that genuine hospitality or similar business expenditure that is reasonable and proportionate will not be caught by the Bribery Act 2011. Accordingly we can continue with the limited corporate hospitality we offer to clients, suppliers and intermediaries or receive from them as a reflection of our good relations.

If any hospitality is proposed which is different from that which we have customarily provided or received in the past, guidance must be sought from the Operations Director before hospitality is offered to or accepted from a client, supplier or intermediary.