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## **Policy statement**

The directors are opposed to bribery, soliciting, intimidation or extortion in whatever form they may take.

The directors do not believe that it is appropriate for employees to distort or influence correct business practises with individuals or businesses with which the company has (or might have) commercial relations. It is important that no employee acts in any way that conflicts with the policy.

## **Bribery & solicitation**

For the purposes of influencing a decision or achieving an outcome, employees shall not :

- Offer or give any payments, gifts or inducements

Exceptions may relate to gifts &/or entertainment if they are of modest value. The agreement must be obtained from a manager before consideration is being made.

## **Intimidation & extortion**

No acts of intimidation or extortion – for any form of gain or influence – are acceptable to the directors.

## **Fraudulent acts**

The directors do not accept fraud. Such acts, carried out for profit or to gain some unfair or dishonest advantage, include :

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| <ul style="list-style-type: none"><li>• Deceit</li><li>• Trickery</li><li>• sharp practice</li></ul> | <ul style="list-style-type: none"><li>• Breach of confidence</li><li>• The alteration or incorrect completion of paperwork or data</li></ul> |
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## **Receipt of gifts – disclosure**

Employees must not accept gifts, money or entertainment from third party organisations or individuals where these might reasonably be considered likely to influence a decision.

The recipient is required to return the gift to the sender, with a polite note thanking him/her & explaining that return is the company's policy on gifts.

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Exceptions may relate to items of modest value, where the employee must ensure that their manager is made aware of the item. The manager may allow the employee to accept the gift, taking account of its purpose eg. a token of gratitude for work carried out to a particularly high standard. Not disclosing modest gifts breaches the policy.

This policy does not apply to promotional gifts, i.e. items such as stationery or pens that bear the logo or company name of another organisation, provided that these have no significant value. However, since it is likely that such gifts will be received by only a limited number of employees, they should be shared amongst other members of staff where appropriate.

### **Breaches of this policy**

Where an employee breaches this policy – which may become known by whistleblowing, complaint or information available – the company’s directors will initiate an investigation. The outcome of that investigation may result in disciplinary action & the involvement of the police.

### **Who must comply with this policy?**

This policy applies to all persons working for, or on behalf, of the company.

### **Who is responsible for this policy?**

The directors have overall responsibility for ensuring that this policy complies with the legal obligations, and that employees and associates comply with it. The policy will be reviewed annually, with intermediate reviews which may become necessary.



Neil Bray  
Managing Director  
1<sup>st</sup> January 2021