

Anti-Bribery Policy Statement For Employee Handbooks

1.1 ANTI-BRIBERY POLICY STATEMENT

- 1.1.1** We are committed to applying the highest standards of ethical conduct and integrity in our business activities in the UK and overseas. Every employee and individual acting on the [Entity]'s behalf is responsible for maintaining the [Entity]'s reputation and for conducting [Entity] business honestly and professionally.
- 1.1.2** We aim to carry out our business in a transparent and ethical way and will not conduct business with service providers, agents or representatives that do not support our anti-bribery objectives.
- 1.1.3** We do not tolerate any form of bribery, whether direct or indirect, by, or of, its employees, officers, agents or consultants or any persons or companies acting for it or on its behalf. We are committed to implementing and enforcing effective systems throughout the [Entity] to prevent, monitor and eliminate bribery, in accordance with the Bribery Act 2010.
- 1.1.4** A bribe is a financial advantage or other reward that is offered to, given to, or received by an individual or [Entity] (whether directly or indirectly) to induce or influence that individual or [Entity] to perform public or corporate functions or duties improperly.
- 1.1.5** Employees and others acting for or on behalf of the [Entity] are strictly prohibited from making, soliciting or receiving any bribes or unauthorised payments.
- 1.1.6** As part of its anti-bribery measures, the [Entity] is committed to transparent, proportionate, reasonable and genuine hospitality and promotional expenditure. Such expenditure must be authorised by management in advance, in accordance with our procedures.
- 1.1.7** A breach of the [Entity]'s anti-bribery policy by an employee will be treated as grounds for disciplinary action, which may result in a finding of gross misconduct, and immediate dismissal. Employees and other individuals acting for the [Entity] should note that bribery is a criminal offence that may result in up to 10 years' imprisonment and/or an unlimited fine for the individual and an unlimited fine for the [Entity].
- 1.1.8** The success of the [Entity]'s anti-bribery measures depends on all employees, and those acting for the [Entity], playing their part in helping to detect and eradicate bribery. Therefore, all employees and others acting for, or on behalf of, the [Entity] are encouraged to report any suspected bribery.
- 1.1.9** Employees who suspect bribery or other wrongdoing may be taking place are encouraged to make a complaint under our Whistleblowing Policy, and the [Entity] will support any individuals who make such a report, provided that it is made in good faith.