

The Company is committed to implementing and enforcing effective systems to counter bribery wherever it should manifest. It is the Company's policy to conduct all aspects of its business in an honest and ethical manner at all times, to ensure the continued trust of our existing Clients, in the operation of the company. To those ends we have drafted the following Policy;

Policy

The aim of this policy is to help the Company act in accordance with the Bribery Act 2010, maintain the highest possible standards of business practice, and advise individuals of the Company's 'zero-tolerance' to bribery. This policy applies to all permanent and fixed-term staff employed by the Company, and any contractors, consultants or other persons acting under or on behalf of the Company.

The Company will not:

- Make contributions of any kind with the purpose of gaining any commercial advantage.
- Provide gifts or hospitality with the intention of persuading anyone to act improperly, or to influence a public official in the performance of their duties.
- Make, or accept, "kickbacks" of any kind.

Company Responsibility

The Company will:

- Keep appropriate internal records that will evidence the business reason for making any payments to third parties.
- Encourage employees to raise concerns about any issue or suspicion of malpractice at the earliest possible stage.
- See that anyone raising a concern about bribery will not suffer any detriment as a result, even if they turn out to be mistaken.

Employee Responsibility

Employees must not:

- Accept any financial or other reward from any person in return for providing some favour.
- Request a financial or other reward from any person in return for providing some favour.
- Offer any financial or other reward from any person in return for providing some favour.

Non Compliance

All employees have a role to play in enforcing the policy and are required to deal with any observed or reported breaches. Should employees feel apprehensive about their own safety in regard to addressing any breach, they should seek senior management support.

Failure to comply with this policy may lead to a lack of clarity over job role, learning needs or expected standards of performance, resulting in reduced effectiveness or efficiency, underperformance and putting service delivery at risk.

Any member of staff refusing to observe the policy will be liable to disciplinary action in accordance with the Company's Disciplinary Policy up to and including dismissal.

Implementation of the Policy

Overall responsibility for policy implementation and review rests with the Company senior management. However, all employees are required to adhere to and support the implementation of the policy. The Company will inform all existing employees about this policy and their role in the implementation of the policy. They will also give all new employees notice of the policy on induction to the Company.

This policy will be implemented through the development and maintenance of procedures for appraisals and one-to-one meetings, using template forms, and guidance given to both managers and employees on the process.

This Policy was approved & authorised by:

Name **Daniel Moore**

Position **Managing Director**

Date **30/07/2019**

Signature 