



ANTI-BRIBERY POLICY

1 INTRODUCTION

The Directors of the Company fully recognise and accept their responsibilities under the Bribery Act 2010 and are committed to setting the highest level of ethical conduct and integrity in its business activities.

The Company does not tolerate any form of bribery by or of its employees, agents or consultants or any persons acting on behalf of the Company.

The Directors of the Company are committed to preventing bribery within the workplace and through this policy have implemented effective measures to prevent, monitor and eliminate bribery.

This policy should be read in conjunction with Company Policies and Staff Handbook.

Deon Bryan

Director

2 SCOPE

This policy applies to all employees, temporary workers, consultants, contractors or agents, subsidiaries and associated companies acting on the behalf of the Company.

3 AIMS OF THE POLICY

The purpose of this policy is to outline the Company's position on preventing and prohibiting bribery in accordance with the Bribery Act 2010.

This policy seeks to:

- Make clear that the Company adopts a zero-tolerance approach to acts of bribery or corruption howsoever enacted
- Promote the Company expectation that all employees regardless of seniority will adopt the highest standards of openness, honesty and accountability
- Provide a clear procedure for employees to follow should bribery be suspected
- Provide clear guidelines on what is appropriate and inappropriate with regard to corporate gifts and hospitality.

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4 DEFINITION OF BRIBERY

A bribe is a financial or other type of advantage that is offered or requested with:

- Intention of inducing or rewarding improper performance of a function or activity or knowledge or belief that accepting such a reward would constitute the improper performance of such a function or activity.

For the purposes of this policy relevant functions and activities relates to any function of a public nature, any activity connected with the business, any activity performed in the course of a person's employment and any activity performed by or on behalf of the business where the person performing it is expected to do so impartially, in good faith or is in a position of trust.

The Company prohibits employees or associated persons from offering, promising, giving, soliciting or accepting any bribe. The bribe might be cash, a gift or other inducement to, or from any person or Company, whether a public or government official or a private person or Company, regardless of whether the employee or associated persons are situated in the UK or overseas.

The bribe might be made to ensure that a person or Company improperly performs duties or functions to gain any commercial, contractual or regulatory advantage for the Company in either obtaining or maintaining Company business, or to gain any personal advantage, financial or otherwise, for the individual or anyone connected with the individual. This prohibition also applies to indirect contributions, payments or gifts made in any manner as an inducement or reward for improper performance.

5 BRIBING A PUBLIC OFFICIAL

The Company expressly prohibits the bribing of any public official in order to obtain or retain business or an advantage in the conduct of business. This includes making or receiving facilitation payments.

6 HOSPITALITY AND BUSINESS GIFTS

The Company prohibits the giving or receiving of hospitality/business gifts and similar where the intention is to receive or confer an advantage in return. Corporate entertainment, gifts, hospitality and promotional expenditure may be given or accepted on behalf of the Company where the aim is to:

- Establish and maintain good business relationships

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improve the image of and reputation of the Company

- Present the Company's services effectively. BP035

The following procedures should be followed in relation to giving or receiving all hospitality/business gifts:

- Employees or associated persons should for proposed hospitality and promotional expenditure gain written authorisation from a Director in advance of the proposed dates where the value of the gift or hospitality exceeds the value of £20.

The Director is permitted to authorise proposed hospitality and promotional expenditure within their financial authority, in cases which this exceeds their designated authority the expenditure must be approved by the Managing Director in advance of the proposed dates.

- All hospitality must be proportionate, in line with the business objectives and appropriate to the nature of the business relationship.
- Employees and/or associated persons will be required to supply all records and receipts for purchased goods in accordance with the Company's expenses policy.
- An employee who is in receipt of a gift or hospitality which exceeds the value of £20 should declare this in writing to their Head of Department/Director.

All written authorisation for giving or receiving of hospitality or gifts will need to be given in line the requirements of the Company's Expenses policy. Should an employee be concerned that events or gifts are not being made in good faith or in line with above aims; in the first instance the employee should raise these concerns with their a Director.

6.1 Charitable Donations

The Company is committed to supporting local communities and in line with this may provide charitable donations and initiatives as part of its wider corporate social responsibility. Charities and Fundraising events will only choose to support events undertaken by registered charities; these will be selected impartially and upon their individual's merits.

The Company may also support fundraising events involving employees. Should an employee be approached about providing a charitable donation, or wishes to seek support from the Company for an event, this should be discussed a Director in the first instance.

All donations will need to be approved in writing by a Director or Managing Director as appropriate in line with the Company Expenses Policy.

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7 Internal Audit and Monitoring

A rigorous review of overheads and contract costs is performed on a monthly basis with any unusual or unexplained items being thoroughly investigated and resolved. As part of this analysis the Company will monitor and investigate the contract margins where there appears to be any unusual patterns or trends. The Company will review its financial controls and levels of authority as appropriate to ensure compliance with the Act.

8 Reporting Suspected Bribery

All employees have a responsibility to prevent, detect and report all instances of bribery.

Instances may include:

- Any suspected or actual attempts at bribery
- Concerns that other employees or associated persons may be being bribed; or offering or promising a bribe.
- Concerns that other employees or associated persons may be bribing third parties, such as clients, sub-contractors or government officials. If an employee has any concerns or suspects that a form of bribery is taking place, they should raise their concerns in writing to their Director, Head of Department detailing the grounds for their concerns.

Should an employee feel unable to raise their concerns with the Director, the employee should detail their concerns in writing to the Managing Director; alternatively an employee may choose to raise concerns surrounding suspected bribery through the Company's Whistleblowing policy.

Employees or associated persons who report instances of bribery in good faith will be supported by the Company. Any instances of detrimental treatment by a fellow employee because an employee has made a report may be treated as a disciplinary offence.

9 How the Company Will Respond

The way in which the Company may respond to an employee's or third party's concerns will depend upon the nature of the complaint; Should allegations of bribery be found to be proven against an employee, this may be deemed by the Company to constitute gross misconduct and could result in immediate dismissal.

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10 Review

This Policy will be reviewed from time to time and in line with legislative updates and the current and future needs of the business.

11 Questions and Further Advice

Should you have any questions or queries in relation to this policy please contact a Director.

Director Responsible for Policy and Implementation: Deon Bryan

Signed ...D.Bryan 04/04/2012

Approvals

The signatures below certify that this quality manual has been reviewed and accepted, and demonstrates that the signatories are aware of all the requirements contained herein and are committed to ensuring their provision.

	Name	Signature	Position	Date
Prepared by	Encompass Consultancy Ltd	L.Elliott	Consultant	01/04/2012
Reviewed by	Encompass Consultancy Ltd	L.Elliott	Consultant	01/04/2013
Approved by	Deon Bryan	D.Bryan	Director	04/04/2012

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Amendment Record

This quality manual is reviewed to ensure its continuing relevance to the systems and process that it describes. A record of contextual additions or omissions is given below:

Page No.	Context	Revision	Date

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