

Anti-corruption and bribery policy

NB: These policy templates are provided as general examples for informational purposes only. We're not lawyers, and nothing in these documents should be taken as legal advice. The templates were created in 2025 and may not reflect future legal changes. Employment laws vary by country, state, and even city, so always check current regulations and consult professional legal or HR advisors before implementing any policies in your organization.

About this policy

We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.

We will uphold all relevant laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. However, we remain bound by the laws of the [United Kingdom, including the Bribery Act 2010], in respect of our conduct both at home and abroad.

In this policy, third party means any individual or organisation you come into contact with during the course of your work for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

This policy applies to all individuals working for us or on our behalf in any capacity at all levels.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate training on it.

Bribery and corruption are punishable for individuals by up to 10 years' imprisonment and if the Company is found to have taken part in corruption we could face an unlimited fine, be excluded from tendering for public contracts and experience damage to our reputation. We therefore take our legal responsibilities very seriously.

What are bribery and corruption?

Bribery is offering, promising, giving or accepting any financial or other advantage, to induce the recipient or any other person to act improperly in the performance of their functions, or to reward them for acting improperly, or where the recipient would act improperly by accepting the advantage.

Corruption is the abuse of entrusted power or position for private gain.

What you must not do

It is not acceptable for you, or someone on your behalf, to:

1. Give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
2. Give or accept a gift or hospitality during any commercial negotiations or tender process, if this could be perceived as intended or likely to influence the outcome;
3. Accept a payment, gift or hospitality from a third party that you know or suspect is offered with the expectation that it we will provide a business advantage for them or anyone else in return;
4. Accept hospitality from a third party that is unduly lavish or extravagant under the circumstances.
5. Threaten or retaliate against another individual who has refused to commit a bribery offence or who has raised concerns under this policy; or
6. Engage in any other activity that might lead to a breach of this policy.

What you can do

This policy allows reasonable and appropriate hospitality or entertainment given to or received from third parties, for the purposes of:

- a.** establishing or maintaining good business relationships;
- b.** improving or maintaining our image or reputation; or
- c.** marketing or presenting our products and/or services effectively.

The giving of receipt of gifts is not prohibited, if the following requirements are met:

- 1.** It is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
- 2.** It is given in our name, not in your name;
- 3.** It does not include cash or a cash equivalent (such as gift certificates or vouchers);
- 4.** It is appropriate in the circumstances, taking account of the reason for the gift, its timing and value. For example, in the UK it is customary for small gifts to be given at Christmas;
- 5.** It is given openly, not secretly; and
- 6.** It complies with local law.

Promotional gifts of low value such as branded stationery to or from existing customers, suppliers and business partners will usually be acceptable.

Reimbursing a third party's expenses or accepting an offer to reimburse our expenses (for example, the costs of attending a business meeting) would not usually amount to bribery. However, a payment in excess of genuine and reasonable business expenses (such as the cost of an extended hotel stay) is not acceptable.

We appreciate that practice varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is

whether in all the circumstances the gift, hospitality or payment is reasonable and justifiable. The intention behind it should always be considered.

How to raise a concern

If you are offered a bribe, or are asked to make one, or if you believe or suspect that any bribery, corruption or other breach of this policy has occurred or may occur, you must notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible.

If you are unsure about whether a particular act constitutes bribery or corruption, raise it with your manager or the COO.

We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

Breaches of this policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We reserve our right to terminate our contractual relationship with other workers if they breach this policy.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.