

Anti Bribery Policy

Bribery is an offence under the Bribery Act 2010 which came into force on 1 July 2011. There are four categories of the offence as follows:

- 1. Bribing another person (active bribery);**
- 2. Being bribed (passive bribery);**
- 3. Bribery of foreign public officials; and**
- 4. Failure of commercial organisations to prevent bribery (corporate bribery).**

The firm will not countenance behaviour of this nature. It is not tolerated and will amount to gross misconduct if carried out which leads to summary dismissal. Be vigilant at all times.

We are able to offer hospitality to clients as long as it is not designed to coerce them into doing something that we want that will gain an advantage for us.

If anyone offers you a gift, be careful about acceptance. There is no need to decline in all cases but think about the circumstances in which the gift is being offered and consider the value of it and whether it is intended to induce you to give the donor an unfair advantage.

Remember that suppliers are also able to offer hospitality so a gift at Christmas for supporting them throughout the year or a corporate gift, such as a pen or key ring, is not a bribe.

We have clear charging policies so think if a client offers to pay more than those rates or offers a large sum as an advance when you have not yet requested money on account. This could be an attempted bribe.

Never accept payment in cash without manager approval which is unlikely to be given.

Always seek manager approval if the client wishes to pay in kind i.e. in ways other than money as the value cannot be quantified and could be seen as a bribe if clearly above charge out charging rates in value when applied.

Always seek manager approval before accepting work from a client.

Think carefully about where the client comes from as it may be from a company where corruption is prevalent. Carry out internet research if you are unsure - use government departments such as UK Trade and Investment or UK Diplomatic Posts.

The risks of bribery in this firm are considered high because we do work with clients abroad where bribery is prevalent and we must be vigilant in this regard particularly where we are considering taking on a client from a region where we have not dealt with before.

Do obtain manager approval before accepting hospitality. This will generally be authorised but needs to be monitored in case it is considered to go beyond an acceptable “thank you” for support or to advertise what services are available. In the latter case it must be considered whether the hospitality is unusually lavish rather than a reasonably costed event.

If you need services abroad and are asked to pay something for someone’s trouble or to facilitate a service which may not otherwise be available be on instant alert. Ask if this is an official charge and if a price list is available and if in doubt seek manager approval.