

## HR Policies

Title: Anti-Bribery Policy

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### Anti-Bribery Policy

Bribery is defined by the Bribery Act 2010 as giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for having already done so.

The Company prohibits:

the offering, the giving, the solicitation or the acceptance of any bribe, whether cash or other inducement

**to or from**

any person or company, wherever they are situated and whether they are a public official or body or private person or company

**by**

any individual employee, agent or other person or body acting on the Company's behalf

**in order to**

gain any commercial, contractual or regulatory advantage for the Company in a way which is unethical

**or in order to**

gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual

The Company recognises that market practice varies across the territories in which it does business and what is normal and acceptable in one place may not be in another.

This policy is not meant to prohibit the following practices providing they are customary in a particular market, are proportionate and are properly recorded:

- normal and appropriate hospitality
- the giving of a ceremonial gift
- the use of any recognised fast-track process which is available to all on payment of a fee
- the offer of resources to assist the person or body to make the decision more efficiently provided that they are supplied for that purpose only.

Inevitably, decisions as to what is acceptable may not always be easy. If anyone is in doubt as to whether a potential act constitutes bribery, the matter should be referred to your Supervisor/Manager with responsibility for this policy before proceeding. If necessary, guidance should also be sought from Human Resources.

A breach of this policy may give rise to disciplinary action which may lead to your dismissal without notice.