

# 1. Anti Bribery

<b>POLICY NAME</b>	<b>Anti-Corruption and Bribery</b>
<b>PURPOSE</b>	<b>To ensure all employees are aware of the Company's obligation with regards to anti-corruption and bribery</b>
<b>APPLIES TO</b>	<b>All Employees, Casual Workers, Agency Staff, Volunteers, Interns, Agents, Sponsors and any other person associated with the Company or any of its subsidiaries</b>
<b>DATE IMPLEMENTED</b>	<b>July 2015</b>

## Policy statement

This is a non-contractual policy and could be amended in line with business requirements. It is Ellgia Limited's ('the Company') policy to conduct all of our business in an honest and ethical manner. The company takes a zero-tolerance approach to bribery and corruption and is committed to; acting professionally, fairly and with integrity in its business dealings and relationships wherever we operate; implementing and enforcing effective systems to counter bribery.

The company will uphold all laws relevant to countering bribery and corruption, and remains bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both in the UK and abroad.

The purpose of this policy is to:

- Set out the company's responsibilities and that of its employees, in observing and upholding the company's position on bribery and corruption.
- Provide information and guidance to employees on how to recognise and deal with bribery and corruption issues.

Bribery and corruption are punishable for individuals by up to ten years imprisonment. If the company is found to have taken part in corruption it could face an unlimited fine, be excluded from tendering for public contracts and face damage to its reputation..

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

## What is bribery?

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

## **Gifts and hospitality**

This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties.

If a gift is received it is expected that the employee declare it to their Head of Department.

The Senior Management of the Company will only give or receive gifts if the following requirements are met:

- 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;
- it complies with local law;
- it is given in the Company's name;
- it does not include cash or a cash equivalent (such as gift certificates or vouchers);
- it is appropriate in the circumstances. For example, in the UK it is customary for small gifts to be given at Christmas time;
- taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time;
- it is given openly, not secretly

Gifts will not be offered to, or accepted from, government officials or representatives, or politicians or political parties.

The company appreciate that the practice of giving business gifts 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 or hospitality is reasonable and justifiable; it is the responsibility of the Chief Executive Officer to determine this. The intention behind the gift should always be considered.

## **Facilitation payments and kickbacks**

The company does not make, and will not accept, facilitation payments or "kickbacks" of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official.

If asked to make a payment on behalf of the company, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt which details the reason for the payment. If you have any suspicions, concerns or queries regarding a payment, you should raise these with the Managing Director.

Kickbacks are typically payments made in return for a business favour or advantage. All employees must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by the company.

## **Donations**

The company does not make contributions to political parties, and will only make charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made without the prior approval of the Managing Director.

## **Your responsibilities**

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for the company or under its control. All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your manager or appropriate person in charge as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. For example, if a client or potential client offers you something to gain a business advantage with the company, or indicates to you that a gift or payment is required to secure their business.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct.

## **Record-keeping**

The company must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

You must declare and keep a written record of all hospitality or gifts accepted or offered after authorisation has been given by the Managing Director, which will be subject to managerial review.

You must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with the company's expenses policy and specifically record the reason for the expenditure.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

## **How to raise a concern**

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries, these should be raised with your line manager or appropriate person in charge. Concerns should be reported by following the procedure set out in our Whistleblowing Policy.

## **Protection**

Employees who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. The company aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

## **Who is responsible for the policy?**

Senior Management has overall responsibility for ensuring this policy complies with the company's legal and ethical obligations, and that all those under the company's control comply with it.

## **Monitoring and review**

Senior Management will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible.

All employees are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

This policy does not form part of any employee's contract of employment and it may be amended at any time.