

## Anti-Bribery and Corruption Policy

In compliance with the Bribery Act 2010 (the act) no employee should directly or indirectly offer, promise, give or demand a bribe or other undue advantage to obtain or retain business or gain other improper advantage. Bradbury Group Ltd will uphold all laws relevant to the act, all offers of bribes from third parties must be reported immediately to the Managing Director.

### **Policy statement:**

It is the policy of Bradbury Group Ltd (the company) to conduct business in an honest and ethical manner. As part of that, the company takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships, wherever it operates, and implementing and enforcing effective systems to counter bribery.

### **The purpose of this policy is:**

- To set out the responsibilities of the company, and of those working for it, in observing and upholding our position on bribery and corruption; and
- To provide information and guidance to those working for the company on how to recognise and deal with bribery and corruption issues.

### **Bribery is described as:**

*An inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.*

- Bribery and corruption are punishable for individuals by up to ten years' imprisonment and 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. The company therefore takes its legal responsibilities very seriously.

### **Gifts and Hospitality:**

You must not accept or agree to accept any offer of gifts or services from clients, suppliers, distributors, or any person having similar connections to the company without prior consent/approval from your manager. A breach of this rule may give rise to disciplinary action which may lead to your dismissal without notice.

However, items of a nominal value, such as promotional pens and calendars can normally be accepted without obtaining express permission. Items of more significant value, if permitted, will need to be recorded in writing in the Company's register kept by the Directors

### **Gifts:**

The giving or receipt of gifts is not prohibited, 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 is given in the company's name, not in your name.
- it does not include cash or a cash equivalent (such as gift certificates or vouchers).
- it is appropriate in the circumstances. (i.e.) in the UK it is customary for small gifts to be given at Christmas time.

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- taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time; and it is given openly, not secretly.

**Hospitality:**

This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties, for the purposes of establishing or maintaining good business relationships or improving or maintaining our reputation or image.

You may accept modest working meals and light refreshments without making any declaration or obtaining written consent.

Other hospitality may be accepted, with the prior written consent of your line manager, for instance where the hospitality relates to attendance at a relevant conference or course where it is clear the hospitality is corporate rather than personal.

All such hospitality received must be recorded in the Company’s hospitality register, as should **any** hospitality given on behalf of the Company. This register is kept by the Directors.

**What is not acceptable:**

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

- give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that either a personal or business advantage will be received, or to reward either a personal or business advantage already given;
- give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure;
- accept payment from a third party that you know or suspect is offered with the expectation that it will obtain either a personal or business advantage for them;
- accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that either a personal or business advantage will be provided by the company in return;
- accept a gift or hospitality from a third party who is tendering for a contract to be awarded by the company either on its own or jointly with other parties and for a period of three months after the award of the contract;
- turn a blind eye to any of the above;
- threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
- engage in any activity that might lead to a breach of this policy.

**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. They are not commonly paid in the UK, but are common in some other jurisdictions.

**Donations:**

- The company only makes charitable donations and provides sponsorship that are legal and ethical under local laws and practices and which are in accordance with the company’s internal policies and procedures.

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- We do not make any contributions to political parties.

**Record keeping:**

The company keeps appropriate financial records and have appropriate internal controls in place which evidence the business reason for gifts, hospitality and payments made and received.

**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 workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- You must notify either the Managing Director or follow the steps set out in the Whistleblowing Policy as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. If you are unsure whether a particular act constitutes bribery or corruption, please contact the Human resources office.
- Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with other workers if they breach this 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 aims 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.
- The company is 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 the Human Resources Department immediately.

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