Anti-Bribery Policy

Applies to	All employees, workers, contractors, agency workers, interns and volunteers - and anyone else performing services for or on behalf of the business
Policy owner	Chief Executive, Graham North
Authorised	
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In accordance with the Bribery Act 2010 the purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery and corruption regulations, and to ensure that the Company's business is conducted in a socially responsible manner.

This policy does not form part of your contract of employment. We reserve the right to amend it.

1. Policy statement

Bribery is offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal or a breach of trust. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

It is Anstey Horne's policy to conduct all our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption. We 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 laws relevant to countering bribery and corruption in all jurisdictions in which we operate. However, we remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both home and abroad.

Bribery and corruption are punishable for individuals by up to ten year's imprisonment and a fine. If Anstey Horne is found to have taken part in corruption, we as a company could face an unlimited fine, be excluded from tendering for public contract and face damage to our reputation. We therefore take our responsibilities very seriously.

2. Scope

Who is covered by this policy?

In this policy "third party" means any individual or organisation you come into contact with during the course of your work for Anstey Horne, 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 at all levels and grades, including senior managers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, homeworkers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with Anstey Horne (collectively referred to as "employees" in this policy).

This policy covers:

- Competition law
- Bribes
- Gifts and hospitality
- Facilitation payments
- Political contributions
- Charitable contributions

Competition law and anti-competitive behaviour

Anstey Horne is committed to competing fairly and independently and complying with applicable competition law. Employees must not enter into any agreement, arrangement or understanding, whether formal or informal, with competitors or other third parties that restricts fair competition.

In particular, employees must not:

- agree, coordinate or discuss prices, fees, rates, discounts or other competitors;
- participate in bid rigging, collusive tendering, cover pricing or any arrangement concerning whether, or at what level, a competitor will tender;
- share confidential or commercially sensitive information with competitors, including information about pricing, future pricing intentions, costs, margins, tenders, clients, business strategy or marketing plans;
- agree to divide or share clients, markets, territories or opportunities;
- agree with competitors to restrict services, output or capacity; or
- otherwise engage in conduct intended to prevent, restrict or distort fair competition.

Employees should take particular care when dealing with competitors through industry events. Legitimate industry engagement and benchmarking may be appropriate, but commercially sensitive information must not be exchanged. If a competitor attempts to discuss or share commercially sensitive information, the employee should make clear that they will not participate, end the discussion and report the matter promptly to a Line Manager, Director or the COO. Employees should seek advice before proceeding if they are unsure whether a proposed arrangement or exchange of information could raise competition-law concerns.

Bribes

Employees must not engage in any form of bribery, either directly or through any third party (such as agent or distributor). Specifically, employees must not bribe a foreign public official anywhere in the world.

Gifts and hospitality

Employees must not offer or give hospitality:

- which could be regarded as illegal or improper, or which violates the recipient's policies; or
- to any public employee or government officials or representatives, or politicians or political parties; or
- for staff below level of Director:

which exceeds £50 in value for each individual gift or £250 in value for each hospitality event unless approved by one of the Directors (preferably in writing).

Directors may use their discretion to determine what is deemed appropriate for gifts or entertainment.

Employees may not accept any gift or hospitality from our business partners if:

- it exceeds £100 in value for each gift or £500 in value for each hospitality event unless approved by one of the Directors (preferably in writing); or
- it is in cash; or
- there is suggestion that a return favour will be expected or implied.

If it is not appropriate to decline the offer of a gift, the gift may be accepted, provided it is then declared to one of the Directors or the HR Manager and then may be donated to charity. Anstey Horne will keep a gift register of all gifts received.

We appreciate that the practice of giving varies between countries, regions and cultures and what may be normal and acceptable in one region or culture may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intentions behind the gift should always be considered. If in doubt, please refer to the Steve Walsh or Sue Bailey for guidance.

Facilitation payments and kickbacks

Facilitation payments are a form of bribery made for the purpose of expediting or facilitating the performance of a public official for a routine governmental action, and not to obtain or retain business or any improper business advantage. Facilitation payments tend to be demanded by lower officials to obtain a level of service which one would normally be entitled to.

Anstey Horne's policy is that facilitation payments must not be paid. We recognise, however, that our employees may be faced with situations where there is a risk to personal security of an employee or their family and where a facilitation payment is unavoidable, in which case the following steps must be taken:

- Keep any amount to the minimum.
- Create a record concerning the payment; and
- Report it to a Director/COO/HR Manager

In order to achieve our aim of not making any facilitation payments, each Director of the business will keep a record of all payments made, which must be reported to COO, in order to evaluate the business risk and to develop a strategy to minimise payments in the future.

Note: making personal payments from your own funds rather than company funds will not circumnavigate this policy.

Political contributions

Anstey Horne does not make donations, whether in cash or kind, in support of any political parties or candidates, as this can be perceived as an attempt to gain an improper business advantage.

Charitable donations

Charitable donations and support are acceptable, whether of in-kind services, knowledge, time or direct financial contributions. However, employees must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery. Anstey Horne will only make charitable donations that are legal and ethical under local laws and practices. No charitable donations must be offered or made without the prior approval of one of the directors.

All charitable contributions may be publicly disclosed.

3. Employee responsibilities

Every employee must ensure that they have read, understood and comply with this policy.

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

You must notify one of the Senior Directors as soon as possible if you believe or suspect that a conflict with or breach of this policy has occurred or may occur in the future.

Any employee who engages in bribery, corruption or anti-competitive behaviour, or knowingly facilitates such behaviour, may face disciplinary action, which could result in dismissal for gross misconduct.

4. Record keeping

Anstey Horne will keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to a third party.

Every employee must declare and keep a written record of all hospitality or gifts accepted or offered which will be subject to managerial audit without notice.

Every employee must ensure all expense claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with the Anstey Horne expenses policy and specifically record the reason for the expenditure.

All accounts, invoices and other documents and records relating to dealings with third parties, such as clients, suppliers and business contracts will be prepared and maintained with strict accuracy and completeness. Accounts will not be kept “off-book” to facilitate or conceal improper payments.

5. Raising a concern

Employees are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether an act or proposed arrangement could constitute bribery, corruption or anti-competitive behaviour, including inappropriate discussions with competitors about fees, tenders, clients, markets or commercially sensitive information, you should seek guidance from a Director or the COO.

6. Employees who fall victim of bribery or corruption

It is important employees inform one of the Directors/COO/HR Manager as soon as possible if they are offered a bribe by a third party, are asked to make one or suspect that this may happen in the future.

7. Protection

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

Anstey Horne is committed to ensuring employees do not suffer 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 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. Any employee that believes they have suffered any such treatment should inform one of

the Directors or the HR Manager immediately. If the matter is not remedied, employees should raise it formally using the Grievance Procedure.

8. Training and communication

Training on this policy will form part of the induction process for all new employees. All existing employees will receive, regular, relevant training on how to implement and adhere to this policy. In addition, all employees will be asked to formally accept conformance to this policy on an annual basis.

Anstey Horne's zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of the business relationship with them and as appropriate thereafter.

9. Questions and administration

Stephen Walsh, Chief Operating Officer is responsible for administering this policy. If you have any questions about whether a particular gift, payment or hospitality arrangement is appropriate, please speak to your line manager or contact stevewalsh@ansteyhorne.co.uk or suebailey@ansteyhorne.co.uk before proceeding.

Related policies: Whistleblowing Policy - Disciplinary Policy - Grievance Policy – Anti-Money Laundering

This policy does not form part of any contract of employment.