

# Anti-Bribery and Corruption Policy and Procedure

**Human Resources Department**

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## Anti-Bribery and Corruption Policy

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### 1. Introduction

Dorsuite (The Company) values its reputation for ethical behaviour and for financial probity and reliability. It recognises that over and above the commission of any crime, any involvement in bribery will also reflect adversely on its image and reputation.

The Bribery Act 2010 came into effect during April 2011, superseding previous legislation. Notably it made failing to prevent bribery a corporate offence. It also made bribing a foreign public official an individual criminal offence.

Bribery or corruption by Company employees will be treated as a serious disciplinary offence. Should it occur, the Company will take firm action, which may include dismissal and legal action.

### 2. Scope

This policy applies to every employee, including temporary, agency, voluntary workers and employees of subsidiary companies. It applies to all activities of the Company.

The Company expects anyone acting on its behalf to have procedures in place to prevent bribery and corruption. This includes agents and others who represent the Company, and suppliers who perform services for the Company in the UK and in other countries.

### 3. Standards

The Company prohibits the offering, giving, solicitation or 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 behalf of the Company
- In order to gain any commercial, contractual or regulatory advantage for the Company in a way that is unethical
- in order to gain any personal advantage (pecuniary or otherwise) for the individual or anyone connected with the individual

This policy prohibits any inducement that results in a personal gain or advantage to the recipient or any person or body associated with them, and which is intended to influence them to take action that may not be solely in the interest of the Company or of the person or body employing them or whom they represent.

The policy is not meant to prohibit normal and appropriate hospitality or the giving of a gift on a festival or at another special time, providing they are customary in a particular market, are proportionate and are properly recorded.

Inevitably, decisions as to what is acceptable may not always be easy. If you are in any doubt as to whether a potential act constitutes bribery, the matter should be referred to HR before proceeding.

#### **4. Employees' responsibility**

The prevention, detection and reporting of bribery is the responsibility of all employees and the Company is committed to:

- encouraging employees to be vigilant and to report any suspicion of bribery,
- providing employees with suitable channels of communication and ensuring that sensitive information is treated appropriately,
- investigating instances of alleged bribery and assisting the police and other appropriate authorities in any resultant prosecution,
- taking disciplinary action against any individual(s) involved in bribery.

Employee's must abide by the Company's financial regulations on gifts and hospitality, to be recorded in Appendix One. These require that, with the exception of low value gifts such as a gift with less than £50 or hospitality worth less than £50 per person, employees must seek written permission from their Head of Department before accepting gifts or hospitality from potential or existing suppliers or their agents. Under no circumstances must the receipt of gifts or hospitality influence the choice of a supplier, and, if there is any doubt, then gifts and/or hospitality should be refused.

Employee's should advise HR who will maintain the gift and hospitality register.

## **5. Training and its Objectives**

Training on our HR system should be completed to assist employees in understanding their duties in terms of UK Anti Bribery and Corruption legislation. Anyone involved in Procurement and Sales should complete this training regularly.

The objectives of the training are that participants will be able to:

- Understand what bribery is (direct and indirect forms of Bribery)
- Understand the Bribery Act 2010
- Identify instances of corruption and feel confident about reporting them
- Anticipate difficult situations and take the necessary steps to avoid them
- Deal with ethical dilemmas in the workplace
- Understand that the onus is on the individual to comply with the Act
- Apply the knowledge acquired in the course to comply with the Act
- Instil respect for the law and inspire an ethical approach amongst all colleagues

## **6. Exceptions**

The Company recognises that exceptional circumstances might arise in which an employee's refusal to offer or accept a bribe might cause immediate personal danger to that individual. In such circumstances, a payment may be offered or accepted, but this must be reported and recorded at the time of the event or as soon as possible thereafter.

## **7. Associated Procedures**

Disciplinary Procedure and Policy

## **8. Implementation and Monitoring**

The implementation of this policy will be monitored, and a review of its effectiveness carried out at regular intervals. The HR Manager will be responsible for monitoring and review of this policy.

## **9. Disclaimer**

This policy does not form any part of an employee's contract of employment and the Company may amend, suspend or withdraw this policy at any time.

**Register of Gifts and Hospitality****Appendix One**

Name	Position	Date offered	Accepted / rejected	Date recorded	Gift / Hospitality	Accompanied to event (Y/N)	Received from?	Value (£)