



ANTI-BRIBERY

POLICY

14th February 2020

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NAME	ROLE	DATE APPROVED	VERSION	NEXT REVIEW BY DATE
Natalie Walker	Compliance & Operations Manager	2020-02-18	2.2	14/02/2021

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INTRODUCTION

The Company is committed to the highest standards of ethical conduct and integrity in its business activities. This policy outlines the Company's position on preventing and prohibiting bribery, in accordance with the Bribery Act 2010. The Company will not tolerate any form of bribery by, or of, its employees, agents or consultants or any person or body acting on its behalf. The company is committed to implementing effective measures to prevent, monitor and eliminate bribery.

SCOPE

This policy applies to all employees of the Company and to temporary workers, consultants, contractors, agents and subsidiaries acting for, or on behalf of, the Company ("associated persons"). Every employee and associated person acting for, or on behalf of, the company is responsible for maintaining the highest standards of business conduct. Any breach of this policy is likely to constitute a serious disciplinary, contractual and criminal matter for the individual concerned and may cause serious damage to the reputation and standing of the Company.

The Company may also face criminal liability for unlawful actions taken by its employees or associated persons under the Bribery Act 2010. All employees and associated persons are required to familiarise themselves, and comply, with this policy, including any future updates that may be issued from time to time by the Company.

PRINCIPLE

The Company is committed to complying with the Bribery Act 2010 in its business activities as follows:

- The Company will carry out its business fairly, honestly and openly showing transparent payment terms and clear records
- The Company will not make bribes, nor will it condone the offering of bribes on its behalf, so as to gain a business advantage
- The Company will not accept bribes, nor will it agree to them being accepted on its behalf in order to influence business
- The Company will avoid doing business with others who do not accept its values and who may harm its reputation
- The Company will keep clear and updated records of all corporate hospitality, entertainments or gifts accepted or offered
- The Company will make sure that everyone in its business and their business partners know its principles
- The Company will regularly review and update its programme and processes as required

A criminal offence will be committed under the Bribery Act 2010 if:

- An employee or associated person acting for, or on behalf of, the Company, offers, promises, gives, requests, receives or agrees to receive bribes
- An employee or associated person acting for, or on behalf of, the Company, offers, promises or gives a bribe to a public official with the intention of influencing that official in the performance of their duties
- The Company does not have the defence that it has adequate procedures in place to prevent bribery by its employees or associated persons

WHAT IS PROHIBITED

The Company prohibits employees or associated persons from offering, promising, giving, soliciting or accepting any bribe. The bribe might be cash, a gift or other inducement to, or from, any person or company, whether a public or government official, official of a state controlled industry, political party or a private person or company, regardless of whether the employee or associated person is situated in the UK or overseas. The bribe might be made to ensure that a person or company improperly performs duties or functions (for example, by not acting impartially or in good faith or in accordance with their position of trust) to gain any commercial, contractual or regulatory advantage for the Company in either obtaining or maintaining Company business, or to gain any personal advantage, financial or otherwise, for the individual or anyone connected to the individual.

The prohibition also applies to indirect contributions, payments or gifts made in any manner as an inducement or reward for improper performance, for example through consultants, contractors or sub-contractors, agents or sub-agents, sponsors or sub-sponsors, joint-venture partners, advisors, customers, suppliers or other third parties.

CORPORATE ENTERTAINMENT, GIFTS, HOSPITALITY AND PROMOTIONAL EXPENDITURE

PRINCIPLE

Gifts and entertainment can sometimes be disguised bribes or be misinterpreted as bribes, so the Company has set out the following rules which clearly define what it considers to be genuine and acceptable and what it does not.

GIFTS

The Company may accept gifts of small items of limited value but may not accept valuable items, such as jewellery or airline tickets.

Although the Company may accept a gift now and then, it must not accept gifts which are given regularly or often.

The Company rule is that gifts it gives must be of moderate value, legal under local law and agreed by management.

ENTERTAINMENT

The Company may give and accept reasonable, hosted entertainment which is in the legitimate interests of the business.

The Company will not give or accept lavish or frequent entertainment which is not hosted.

HOW TO REPORT SUSPICION OF BRIBERY

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 queries these should be raised with your manager or a member of the senior leadership team.

IPI encourages openness and will support anyone who raises genuine concerns in good faith under this policy.

IPI 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.

ACTION BY THE COMPANY

The company will fully investigate any instances of alleged or suspected bribery. Employees suspected of bribery may be suspended from their duties while the investigation is carried out. The Company will invoke its disciplinary procedures where any employee is suspected of bribery and proven allegations may result in a finding of gross misconduct and immediate dismissal. The Company may terminate the contracts of any associated persons, including consultants or other workers who act for, or on behalf of, the Company who are found to have breached this policy.

The Company may also report any matter to the relevant authorities.