

Anti-Bribery Policy

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Scope:

All Staff

Distribution:

Staff Handbook

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Date	Ver	Changes
15/10/2018	1.00	Initial Release
24/10/2018	1.1	Removed paragraph
04/01/2021	2.0	Amendments to format and new document control process
07/01/2022	3.0	Update to Global ATS branding logo and review of document by HR Manager

Approved By:

Name	Position
Marcus Mimms	Managing Director
Signed	Date
	10/01/2022

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It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our dealings wherever we operate. We are also committed to implementing and enforcing effective systems to counter bribery.

1. Who is covered by the policy?

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, and any other person providing services to us.

2. What is a bribe?

A bribe is a financial or other advantage offered or given:

- to anyone to persuade them to or reward them for performing their duties improperly or
- to any public official with the intention of influencing the official in the performance of his duties.

3. Gifts and Hospitality

This policy does not prohibit giving and receiving promotional gifts of low value and normal and appropriate hospitality. However, in certain circumstances gifts and hospitality may amount to bribery and all employees must comply strictly with our ethics policy in respect of gifts and hospitality. We will not provide gifts or hospitality with the intention of persuading anyone to act improperly or to influence a public official in the performance of his duties.

4. Donations

We do not make contributions of any kind to political parties. No charitable donations will be made for the purpose of gaining any commercial advantage.

5. Record Keeping

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

All expense claims relating to hospitality, gifts or expenses incurred to third parties must be submitted in accordance with our 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, must be prepared and maintained with strict accuracy and completeness. No accounts must be kept “off-book” to facilitate or conceal improper payments.

6. Raising Concerns

Employees will be encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. No employee will suffer any detriment as a result of raising genuine concerns about bribery, even if they turn out to be mistaken.

7. Monitoring

The effectiveness of this policy will be regularly reviewed by the Board. Internal control systems and procedures will be subject to audit under the internal audit process.