

Company Policy on Bribery

FROM [CEO] [*insert Name*]

We run our business[es] with integrity. All of us must work together to ensure that they remain untainted by bribery or corruption. This policy is integral to that effort and we are all, the board and all employees of [*Company*] bound by it.

This policy covers the offer or receipt of gifts, hospitality or expenses to ensure that any legitimate expenditure is recorded and does not improperly affect the outcome of procurement, application or any other business transaction.

- 1 [*Company*] forbids any officer or employee of [*Company*] from soliciting any gift or hospitality in the course of his/her employment.
- 2 [*Company*] forbids any officer or employee of [*company*] from offering or receiving from any person or organization who has had, has or may have any influence over the business of [*Company*]:
 - 2.1 a personal or corporate gift to a value in excess of £[*insert amount*];
 - 2.2 hospitality to a value in excess of £[*insert amount*].

These values apply to gifts or hospitality given or received in the UK. For values relevant to gifts or hospitality given or received in other countries please refer to Annex A.

- 3 [*Company*] forbids any officer or employee of [*Company*] from offering or receiving any gift or hospitality which is in breach of relevant law.
- 4 [*Company*] forbids any officer or employee of [*Company*] directly or indirectly from making an offer of, or making a donation to any political, charitable or not for profit organisation in the course of his/her employment as a way to obtain an advantage in a business transaction.
- 5 [*Company*] may exercise its discretion to permit gifts or hospitality which exceeds the threshold limits in paragraph 2. This discretion may only be exercised by [*CEO*] and [*Chief FD*] jointly.
- 6 All officers and employees of [*Company*] must enter details of all gifts and hospitality made or received which are permitted by paragraphs 2, 3 and 5, onto the Central Register of Gifts.
- 7 The Central Register of Gifts is reviewed and monitored by the [*Chief FD*] and the management of [*Company*] and will be audited.
- 8 Compliance with this Gifts and Hospitality Policy is a condition of each Officer's and employee's employment contract. Each Officer and employee is responsible for reading and knowing the contents of this policy.

[*Company*] provides training on compliance with this Gifts and Hospitality Policy but if any Officer or employee has any questions on this policy please contact your line manager or [Director of Risk] or [Chief Counsel].
- 9 Every employee or officer of [*Company*] has a responsibility to speak out if they [we] suspect corruption or is aware of any gift or hospitality given or received which may be in breach of this policy. Any concern in respect of such a breach by:

- another staff member;

- a third party who represents us;
- by one of our suppliers or competitors; or
- by anyone else perhaps even a customer seeking to get better terms from us;

must be reported [to your line manager and to [Head of Legal or Director of Risk] as soon as possible. If for any reason you cannot do this, please report it to [Head of Internal Audit] or [telephone our Whistleblowing Hotline on telephone number [enter telephone number]]. This can be done anonymously.][in accordance with the procedure set out in the company's whistleblowing policy, which is [available on the intranet][set out in the employee handbook].]

[Company] will investigate all allegations of any breach of this policy, or any allegations of suspected corruption immediately.

CEO [*enter name*]

Annex A

- 1 [Company] forbids any officer or employee of [company] from offering or receiving from any person or organization who has had, has or may have any influence over the business of [company] in [enter country]:
 - 1.1 a personal or corporate gift to a value in excess of [enter currency and amount] in [enter country];
 - 1.2 hospitality to a value in excess of [enter currency and amount] in [enter country].