



Anti-Bribery & Corruption Policy

This policy applies to all companies within the Relyon Group.

Purpose

The purpose of this policy is:

- To set out the company responsibilities, and of those working for us, in observing and upholding our position on bribery and corruption; and
- To provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues.

Introduction

This policy is designed to ensure that all our business is conducted in an open, honest and ethical manner.

We take a zero-tolerance stance to bribery and corruption in all business dealings and expect that relationships are conducted in a transparent and professional manner.

We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. However, we remain bound by the laws of the UK, including the Bribery Act 2010.

Bribery and corruption are punishable for individuals by up to ten years' imprisonment and the Company are found to have taken part in corruption, we could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation. The Company therefore take our legal responsibilities very seriously.

This policy refers to third parties, which means any individual or organisation that our employees come in to contact with during the normal course of their day-to-day activities at work. It includes, clients, potential clients, sub-contractors, potential sub-contractors, business contacts, government and public bodies, politicians and political parties.

Who is covered by this policy?

This policy applies to all individuals, working at all levels within the business including, senior manager and directors.

What is a bribe?

A bribe is a reward offered, promised or provided in order gain any commercial, contractual, regulatory or personal advantage.

The Bribery Act 2010 classifies a bribe as a financial or other type of advantage that is offered or requested with;

- Intention of inducing or rewarding improper performance of a function or activity; or

- Knowledge or belief that accepting such a reward would constitute the improper performance of such a function or activity

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; or
- An employee or associated person acting for, or on behalf of the Company offers, promised or gives a bribe to a public official with the intention of influencing that official in her performance of his/her duties; and
- The Company does not have the defence that it has adequate procedures in place to prevent bribery by its employees or associated persons.

All employees and associated persons are required to comply with this policy in accordance with the Bribery Act 2010.

Gifts and Hospitality

This policy does not prohibit normal and appropriate hospitality whether given or received, to or from third parties. The giving of gifts is not prohibited, if the following requirements are met;

- It is not gifted or made with the intention of influencing a third party to award or retain business, or any advantage that could lead to the awarding or retention of any business.
- It complies with the law.
- It is given in the Company Name, not in the name of any individual.
- It is not cash or any cash equivalent such as gift vouchers.
- It is appropriate in the circumstance, i.e. a small token at Christmas.
- The gift is of an appropriate type and value for the reason being given.
- It is given openly and not in secret.

Gifts should not be offered to, or accepted from, government officials or representatives, or politicians or political parties, without the prior approval of a Director.

What is not acceptable?

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 organisation, whether a public or government official, official of a state-controlled industry, political party or a private person or organisation, 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 organisation 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 with the individual.

This 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.

It is not acceptable for an employee to:

- Give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given.
- Give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to “facilitate” or expedite a routine procedure.
- Accept payment from a third party that you know, or suspect is offered with the expectation that it will obtain a business advantage for them.
- Accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return.
- Threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy.
- Engage in any activity that might lead to a breach of this policy

Donations

The Company only makes charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made without the prior approval of a Managing Director.

Your Responsibilities

It is the responsibility of all employees to read, understand and comply with this policy.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify the Head of Group Services or a Managing Director as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future. For example, if a client or potential client offers you something to gain a business advantage with us, or indicates to you that a gift or payment is required to secure their business.

Employees must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are 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, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept “off-book” to facilitate or conceal improper payments.

How to raise 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 a particular act constitutes bribery or corruption, or if you have any other queries, these should be raised with the Head of Group Services or a Managing Director. Concerns should be reported by following the procedure set out in the whistle-blowing policy.

It is important that you tell your line manager as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

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

We are 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. If you believe that you have suffered any such treatment, you should inform the Head of Group Services or a Managing Director immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

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 being 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, including the Director of Public Prosecutions, Serious Fraud Office, Revenue and Customs Prosecutions Office and the police. The Company will provide all necessary assistance to the relevant authorities in any subsequent prosecution.



