



Compliance statement: 017rev1

Anti-Corruption and Bribery Policy Statement

The Anti-Corruption and Bribery Policy is intended to comply with the United Kingdom Bribery Act of 2010, and similar regional, national or international laws.

We conduct all our business in an honest and ethical manner. We believe that conducting our business ethically not only ensures legal compliance but also protects the reputation of our organisation. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery and corruption.

The Anti-Corruption and Bribery Policy states that all corruption and bribery offers activities are unacceptable and prohibited, including:

- (a) 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;
- (b) give or accept a gift or hospitality during any commercial negotiations or tender process, if this could be perceived as intended or likely to influence the outcome;
- (c) accept a payment, gift or hospitality from a third party that you know or suspect is offered with the expectation that it will provide a business advantage for them or anyone else in return;
- (d) offer or accept a gift to or from government officials or representatives, or politicians or political parties;
- (e) threaten or retaliate against another individual who has refused to commit a bribery offence or who has raised concerns under this policy; or
- (f) engage in any other activity that might lead to a breach of this policy.

Responsibilities and Violation of the Anti-Corruption and Bribery 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. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

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

This policy is reviewed continually by the European Quality Assurance Manager in consultation with the Strategic Management Team.

Linked documents:		
• Anti-Corruption and Bribery Policy	• Whistleblowing Policy	• Grievance Policy
Date	Change History	
Current November 2023	C001, C014, C039	