

Anti-Bribery and Corruption Policy

Introduction

1. It is our policy to conduct 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 business dealings and relationships wherever we operate. We are committed to implementing and enforcing effective systems to counter bribery and corruption.
2. We will uphold all laws relevant to countering bribery and corruption including the Bribery Act 2010, in respect of the conduct of our business.

Purpose

3. We believe we have a duty to set out our responsibilities, and of those working for us, in observing and upholding our position on bribery and corruption. We will provide information and guidance to those working for us on how to identify and deal with bribery and corruption issues.

Scope

4. This policy applies to all employees working at all levels of the organisation, including senior managers, officers, directors, employees, consultants, home workers, part-time and fixed-term workers, casual and agency

Status

5. This policy does not form part of any employee's contract of employment and we may amend it at any time.

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What is bribery and corruption in the workplace?

6. It is a criminal offence to offer, promise, give, request, or accept a bribe. Individuals found guilty can be punished by up to ten years' imprisonment and/or a fine. As an employer if we fail to prevent bribery, we can face an unlimited fine, exclusion from tendering for public contracts, and damage to our reputation. We therefore take our legal responsibilities very seriously.
7. It is not acceptable for you (or someone on your behalf) 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 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
 - accept a payment, gift or hospitality from a third party that you suspect is offered with the expectation that it we will provide a business advantage for them or anyone else in return
 - accept hospitality from a third party that is unduly lavish or extravagant under the circumstances
 - offer or accept a gift to or from government officials or representatives, or politicians or political parties
 - threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
 - engage in any other activity that might lead to a breach of this policy
8. 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 staff are required to avoid any activity that might lead to, or suggest, a breach of this policy.
9. You must notify a 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

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something to gain a business advantage with us or indicates to you that a gift or payment is required to secure their business.

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

Receiving Gifts/Corporate Hospitality

11. The 'Gift/Hospitality Authorisation Form' should be completed whenever a member of staff is offered or sent a gift or hospitality.
12. This does not include standard promotional items such as branded pens, pencils, notepads or other promotional items that would ordinarily be found at conferences or sent through everyday. All staff and Directors are required to complete the form and obtain authorisation before accepting gifts or hospitality. Once approved these forms will be held in a register and periodically reviewed to ensure no bias is being given to suppliers or clients.
13. Failure to adhere to this policy will constitute a disciplinary offence and may lead to disciplinary action up to and including

Corporate Hospitality of Clients or Suppliers

14. Official guidance by the Ministry of Justice recognises that "Bona fide hospitality and promotional or other business expenditure which seeks to improve the image of a commercial organization, better to present products and services or establish cordial relations" is an established and important part of doing business. It is not intended for the Act to prohibit reasonable and proportionate hospitality and promotional or other similar business expenditure intended for these purposes.
15. It is, however, clear that hospitality and promotional or other similar business expenditure can be employed as a bribe. For example, inviting a long-standing client out for a day at the races or sailing once a year would be viewed as thanking them for their business. Taking the same client out for dinner every month could be construed as a bribe to ensure their continued business.

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16. All staff and Directors are required to complete an authorisation form and obtain approval before issuing invitations for corporate Forms will be held in a register and periodically reviewed.