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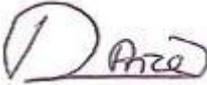
POLICIES AND PROCEDURES

Policy:	Anti-Bribery Policy
Category:	Corporate Governance Policy
Policy No:	ENVFD005

Responsible Person: Finance Director

Date of issue: December 2021

Next review date: December 2022

Name/Title	Signature	Date
Ricci Price Finance Director		December 2021

Document Control Sheet

Date of Revision/Amendment	Name & Signature of Manager/Director Inserting Revision or Amendment
31/07/2015	Ricci Price - None
30/04/2017	Ricci Price - None
27/04/2018	Ricci Price - None
26/04/2019	Ricci Price - None
21/04/2020	Ricci Price - None
09/12/2021	Ricci Price - Gift value limit amended

POLICY

Introduction

The Bribery Act 2010 (effective 1 July 2011) requires organisations to have a clearly stated anti-bribery policy. The Act introduces a new crime of failure to prevent bribery, which means that any organisation unable to demonstrate that they have implemented adequate procedures to prevent corrupt practices within their ranks, or by third parties on their behalf, could be exposed to unlimited fines. Environtec Limited values its reputation for ethical behaviour, financial probity and reliability. Any involvement in bribery would reflect adversely on the organisations image and reputation. The purpose of developing this policy is, therefore, not only to ensure that the organisation is compliant with the legislation, but is actively taking steps to protect its reputation.

Definition

Bribery is the accepting of gifts, money, hospitality or other favours in return for providing something of value to the briber. The purpose of this policy is to set out the rules that must be followed in this organisation to ensure that no bribery occurs.

Unacceptable behaviour

The following behaviour (on the part of any employee, contractor or volunteer involved with the organisation) is unacceptable, and must not occur:

- accepting any financial or other reward from any person in return for providing some favour;
- requesting a financial or other reward from any person in return for providing some favour;
- offering any financial or other reward from any person in return for providing some favour.

Business gifts

From time to time, customers, suppliers or other persons might offer a gift to an employee, contractor or volunteer. This could be a small item, or something of considerable value. All gifts, however small, must be reported to the head of department and recorded by Ricci Price, person who holds responsibility for the gifts register. No gifts with a value of more than £50 may be accepted. If a gift is offered

and then refused because of its value, this must be reported to the head of department and recorded in the gifts register.

Hospitality

From time to time, customers, suppliers or other persons might invite an employee to a hospitality event. All such invitations must be reported to the head of department. Permission must be given by the head of department before any employee or contractor or volunteer accepts any invitation and it must be logged in the gifts register.

Offering gifts and hospitality

It is not this organisation's custom to offer small gifts to customers, suppliers and other persons unless these are small items of a promotional nature or issued following an assessment of need for the item ie pens, diaries or an umbrella. If a gift is authorised by Directors the employee is entitled to give it to the appropriate individuals. A record must be kept of all gifts within the case notes made as part of their assessment.

This organisation occasionally runs hospitality events, primarily aimed at thanking customers and suppliers for their custom and loyalty. An employee (or contractor or volunteer) must not organise any additional hospitality event without seeking authority from his or her head of department. Keeping a record of such promotional items distributed at an event and to which individuals may prove difficult as long as the value of each individual gift is below £50.

Responsibilities of the head of department

Heads of department are responsible for keeping a record of all gifts and hospitality that are offered and/or received by employees (contractors, consultants, volunteers) working in their area of responsibility.

If heads of department are concerned about any actions, they should contact the managing director immediately to raise their concerns and for advice on the appropriate action to take.

Heads of department are also responsible for ensuring that all their employees (contractors, consultants, volunteers) are aware of this policy, and fully understand the rules in relation to the acceptance of gifts and hospitality.

Expenses

Heads of department must authorise all expense claims from their employees. Heads of department are expected to check and sign all expense claims from their employees against receipts. Please also refer to the organisation's expenses policy.

Any items of expenditure that give rise to concern should be fully investigated.

Attempts to bribe

Any employee who is concerned that he or she is potentially being bribed should report this matter to his or her head of department immediately.

Donations to organisations

The organisation makes regular donations to charity. These are managed by Paul Shaw. No employee should make donations to a charity without approval of this manager.

No donations should be made to charities, political parties or other organisations with the intention of gaining a business advantage.

Disciplinary action

Any employee found to have offered or accepted a bribe will face disciplinary action which could include dismissal for gross misconduct as per the organisation's disciplinary policy. The organisation will ensure that all necessary action is taken to resolve any issues, including involvement of the police if required.

Raising concerns

If an employee is concerned that acts of bribery are occurring in the organisation they should inform their head of department in the first instance. If this course of action is inappropriate, the employee should inform another senior manager and/or refer to the organisation's whistleblowing policy.

NOTE: *The Company reserves the right to amend this policy in the light of any future changes in legislation or business need.*