



## **Anti-Corruption and Anti-Bribery Policy**

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## 1. Introduction

1.1 *We aim to conduct all of 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 and enforcing effective systems to counter bribery.*

1.2 *We will uphold all laws relevant to countering bribery and corruption wherever we operate. However, we remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both at home and abroad.*

1.3 *The aim of this policy is to:*

- Set out our responsibilities, and of those working for us, in observing and upholding our position on bribery and corruption
- Provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues

1.4 *Bribery and corruption are punishable for individuals by up to ten years' imprisonment and if we 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. We therefore take our legal responsibilities very seriously.*

1.5 *We are all responsible for detecting and reporting bribery and corruption. You should familiarise yourself with and abide by this policy and report any concerns or suspicions of bribery or corruption in accordance with this policy at the earliest opportunity.*

1.6 In this policy, third party means any individual or organisation you come into contact with during the course of your work for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

1.7 *This policy does not form part of any employee's contract of employment and may be amended by the company at any time.*

1.8 Further advice and guidance on the application of this policy is available from HR.

## 2. Scope

2.1 This policy covers all FJN Recruitment / ATDP / S3 Science employees.

2.2 Those providing services on our behalf such as service delivery partners, casual workers and agency staff, consultants, contractors and volunteers are expected to abide by this policy.

2.3 *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.*

### 3. What is Bribery?

3.1 *A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.*

Examples:

Offering a bribe

You offer a potential client tickets to a major sporting event, but only if they agree to do business with us.

This would be an offence as you are making the offer to gain a commercial and contractual advantage. We may also be found to have committed an offence because the offer has been made to obtain business for us. It may also be an offence for the potential client to accept your offer.

Receiving a bribe

A supplier gives your nephew a job, but makes it clear that in return they expect you to use your influence in our organisation to ensure we continue to do business with them.

It is an offence for a supplier to make such an offer. It would be an offence for you to accept the offer as you would be doing so to gain a personal advantage.

Bribing a foreign official

You arrange for the business to pay an additional payment to a foreign official to speed up an administrative process.

The offence of bribing a foreign public official has been committed as soon as the offer is made. This is because it is made to gain a business advantage for us. We may also be found to have committed an offence.

### 4. Gifts, Hospitality and Expenses

4.1 *In general, you should not accept gifts or hospitality, or receive other benefits from anyone which might be seen to compromise your personal judgement or integrity.*

4.2 *In certain circumstances hospitality (given and received) to or from third parties may further FJN Recruitment / ATDP / S3 Science's interests by:*

- Establishing or maintaining good business relationships
- Improving or maintaining our image or reputation

- Marketing or presenting our products and/ or services effectively

4.3 Any hospitality (given and received) must not be over frequent or over generous and must not be lavish or disproportionate to the nature of the relationship.

4.4 *The giving or receipt of gifts is acceptable if the following requirements are met:*

- It is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits
- It complies with local law
- It is given in our name, not in your name
- It does not include cash or a cash equivalent (such as gift certificates or vouchers)
- It is appropriate in the circumstances. For example, in the UK it is customary for small gifts to be given at Christmas time
- Taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time
- It is given openly, not secretly
- Gifts should not be offered, or accepted without the prior approval of your manager

4.5 *Promotional gifts of low value such as branded stationery will usually be acceptable.*

4.6 *Reimbursing a third party's expenses or accepting an offer to reimburse our expenses would not usually amount to bribery (for example, the costs of attending a business meeting). However, a payment in excess of genuine and reasonable business expenses (such as the cost of an extended hotel stay) is not acceptable.*

4.7 *We appreciate that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift should always be considered.*

## 5. What is not Acceptable?

5.1 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, 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
- Knowingly allow any third party acting on FJN Recruitment trading as ATDP / S3 Science's behalf to engage in any such activity that would contravene this policy, even where no FJN Recruitment trading as ATDP / S3 Science employee was the intended beneficiary of such gift, payment or hospitality
- Engage in any activity that might lead to a breach of this policy

## 6. Facilitation Payments and Kickbacks

- 6.1 We do not make, and will not accept, facilitation payments or "kickbacks" of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. They are not commonly paid in the UK, but are common in some other countries.
- 6.2 If you are asked to make a payment on our behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt which details the reason for the payment. If you have any suspicions, concerns or queries regarding a payment, you should raise these with your line manager.
- 6.3 Kickbacks are typically payments made in return for a business favour or advantage. All workers must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.

## 7. Donations

- 7.1 We do not make contributions to political parties.

## 8. Record-keeping

- 8.1 We must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.
- 8.2 You must provide details of all hospitality or gifts accepted or offered; this information should be recorded and retained by managers on behalf of themselves and their reports via the Records of Gifts & Hospitality Form (please refer to Appendix 1). A copy of the form should be

submitted annually on 31<sup>st</sup> March each year to the Finance Director. The details should be provided upon request to Directors, line managers, HR and the Company Security Manager.

8.3 You 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.

8.4 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.

## 9. How to Raise a Concern

9.1 You should raise any concerns about any issue or suspicion of bribery or corruption at the earliest opportunity and without delay. 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.

9.2 We hope that in the majority of cases you will be able to raise any concerns with your line manager. You may tell them in person or put the matter in writing if you prefer.

9.3 Where the matter is more serious, or you feel your line manager has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact FJN Recruitment / ATDP / S3 Science or the Finance and operations manager in confidence either by telephone, email or letter.

9.4 Concerns will be dealt with in accordance with our Whistleblowing Policy.

9.5 If you are unsure about whether a particular act constitutes bribery or corruption, you should discuss it with your line manager or with FJN Recruitment trading as ATDP / S3 Science and raised your concern.

## 10. Protection

10.1 Should you refuse to accept or offer a bribe, or raise concerns or report another's wrongdoing, you may be 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.

10.2 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 compliance manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally via the Company's Grievance Policy.

## 11. Training and Communication

11.1 *This policy will be shared with new employees at induction stage. All existing employees will receive regular, relevant training on how to implement and adhere to this policy.*

11.2 *We will communicate our zero-tolerance approach to bribery and corruption to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.*

## 12. Breaches of the Policy

12.1 *Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with other workers if they breach this policy.*

## 13. Who is Responsible for the Policy?

13.1 *The FJN Recruitment trading as ATDP / S3 Science board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.*

13.2 *The Finance and Operations Manager has day-to-day operational responsibility for this policy. The Finance and Operations Manager will also ensure that employees receive regular and appropriate training on it. All managers are responsible for ensuring those reporting to them are made aware of and understand this policy.*

13.3 *We are all responsible for detecting and reporting bribery and corruption. You should familiarise yourself with and abide by this policy and report any concerns or suspicions of bribery or corruption to your line manager or to FJN Recruitment trading as ATDP / S3 Science Concern at the earliest opportunity.*