

# Anti-Bribery Policy

This document sets out the rules of the Company in relation to Anti-Bribery Act 2010.

Compliance with the Company's policy in relation to bribery and corruption is regarded as part of your contract of employment. If you fail for any reason to follow the rules set out in this document this may result in disciplinary action being taken against you which could result in your dismissal.

**Bribery** is the offer or receipt of any gift, loan, payment, reward or other advantage to or from any person as an encouragement to do something which is dishonest, illegal or a breach of trust, in the conduct of the Company's business.

**Corruption** is the misuse of entrusted power for private gain.

To place this in context, you should be aware that if you engage in activities which are contrary to the Anti-Bribery Act 2010, you could face up to 10 years in prison and/or an unlimited fine, and the Company could also be liable to an unlimited fine and Government sanction.

This policy document is not regarded as exhaustive, but does give specific examples of situations and sets out the rules and procedures which should be followed.

If you are at any time uncertain as to whether your actions will comply with this policy, you must seek guidance from the company's Finance Director.

## You should at all times act in accordance with the following provisions:-

- Behave honestly, be trustworthy and set a good example;
- Use the resources of the Company in the best interests of the Company and do not misuse those resources;
- Make a clear distinction between the interests of the Company and your private interests to avoid any conflict of interest, and if such conflict does arise you should report it to the company's Finance Director immediately;
- Ensure that any community support, sponsorship and charitable donations do not constitute bribery, and if in doubt you should consult the company's Finance Director
- Confidentially report all incidents, risks and issues which are contrary to this policy document to the company's Finance Director
- Raise any issues regarding anti-bribery and corruption laws and the Company's policies. All queries will be dealt with anonymously and a written response will be issued;
- Do not offer or accept bribes.
- Do not, without express prior written approval from the company's Finance Director, offer or accept any gifts or hospitality to or from clients, contractors, suppliers, and other third parties.

**Gifts** are presents such as flowers, vouchers, food and drink. Event and travel tickets given to you as an individual are also gifts when they are not to be used in a hosted business context.

**Hospitality** includes invitations to hosted meals, receptions and events for business purposes.

- Do not offer money to any business associates in order to speed up service or gain improper advantage. This type of bribery is a 'facilitation payment' and is illegal. If you are faced with a demand for a facilitation payment you must actively resist the payment and inform the company's Finance Director

# Anti-Bribery Policy



**The Anti-Bribery legislation applies to all activities of a UK-based business both at home and abroad. This policy therefore applies to ALL activities worldwide, whatever the local law, practices or customs may be.**

By complying with this policy document we aim to ensure that you and the Company will not at any time knowingly breach any relevant anti-bribery legislation and also that by adhering to the Policy the Company can demonstrate that it has adequate procedures in place to prevent such activity.

You have an independent obligation to prevent bribery and corruption in the Company and to ensure that any business activities comply with this policy document and relevant laws.

### Whistleblowing

Any director, officer or employee of the Dane Group of companies may report instances of the giving or receiving of bribes, or suspicions that bribes may have been given or received, through the following channels. These include, but are not limited to:

- Report directly to your Department Manager
- Report to the Personnel/HR Manager
- Report to the companies Finance Director

Please confirm you have read and understood this policy document by signing and dating below.

Name: ..... Date: .....

### Suppliers & Sub Contractors

Dane expects all of its Suppliers and Sub Contractors to work in full accordance our Anti Bribery Policy and the Anti-Bribery Act 2010.

You have an obligation to prevent bribery and corruption between Dane and your company and to ensure that any business activities comply with this policy document and relevant laws. Failure to do so will result in termination of working relations, partnerships and future contracts.

Suppliers or Sub Contractors should report instances of the giving or receiving of bribes, or suspicions that bribes may have been given or received, through the following channels. These include, but are not limited to:

- Report directly to Purchasing or QA Manager
- Report to the companies Finance Director

Please confirm you have read and understood this policy document by signing and dating below.

Company Name: ..... Name: ..... Date: .....

Signed: ..... Title: .....



Signed:

Date: 21<sup>st</sup> July 2015

**G. S. Hall  
Chief Executive**

**Please Note:** This policy is reviewed by the Board of Directors for ongoing suitability once every 6 months via our Management Review Meetings