

## Anti-Bribery Policy

### 1. Introduction

- 1.1. GHM Partnership ("the Company") recognises that trust and confidence in the propriety of its activities is essential to its continuing success and growth. In order to foster the trust and confidence that clients, suppliers, workers and the community in general have in the Company, it is important that the Company, its employees and agents behave, and are seen to behave, appropriately and honestly at all times.
- 1.2. The Company is committed to eliminating bribery and corruption. It is essential that all employees and persons associated with the Company adhere to this policy and abstain from giving or receiving bribes of any form.

### 2. Purpose

- 2.1. This Anti-Bribery Policy aims to:
  - 2.1.1. Protect the reputation of the Company;
  - 2.1.2. Protect employees from accusations of impropriety;
  - 2.1.3. Ensure that all clients and suppliers are dealt with on an equal basis;
  - 2.1.4. Avoid any potential conflicts between employees' private interests and professional duties;
  - 2.1.5. Instil a strong anti-corruption culture in the Company and monitoring adherence to the policy on a regular basis to ensure compliance with the Bribery Act 2010.
- 2.2. Employees are advised that, notwithstanding anything contained herein, where there is any doubt over the permissibility or propriety of accepting a gift or hospitality offer they should decline that offer. Nothing should be accepted which would bring the Company into disrepute.
- 2.3. This policy applies to the Company and to any associated persons as defined by the Bribery Act 2010.

### 3. Conflicts of Interest

- 3.1. The Company holds as fundamental to its success the trust and confidence of those with whom it deals, including clients, suppliers and employees. Conflicts of interest potentially undermine the relationship of the Company with its partners.
- 3.2. In order to help preserve and strengthen these relationships the Company has developed this Policy, which provide rules and guidelines concerning the conduct of its employees aimed at minimising the possibility of conflicts of interest and at avoiding risks associated with bribery and corruption.
- 3.3. All employees and representatives of the Company are expected to act honestly and within the law.

### 4. Receiving Gifts

- 4.1. Save for gifts of low value and which are mere tokens (such as promotional pens, calendars and stationery), excluding money, employees of the Company are not permitted to accept any gifts from customers, suppliers or other third parties involved with the Company.
- 4.2. If an employee is in receipt of a gift, other than of a low value token of appreciation, the employee will be required to return the gift to the sender with a polite letter thanking them and explaining that it is the Company's policy that employees should not receive gifts.
- 4.3. If, in the opinion of your line manager, the gift might constitute a bribe or other inducement, you will be asked to pass the gift to a Director of the Company who will return it to the sender with a suitable letter explaining the Company's policy and asking the sender to comply with the policy in future.
- 4.4. The Company recognises that there may be exceptional instances when refusing a gift will cause significant offence or embarrassment. In such instances the gift may be accepted and subsequently donated to a charity of the Company's choice.
- 4.5. Where practicable any employee minded to accept a gift should first seek approval from a director. If it is not practicable to gain prior approval, the accepting employee should inform a director as soon as possible after receiving the gift.
- 4.6. In cases where the Director determines that the gift constitutes a small token of appreciation for you as a personal reward, you may, at the Director's discretion, be permitted to retain the gift. However, unless the sender of the gift specifically states or makes clear that the gift is intended for you as a personal reward, all gifts are deemed to be the property of the Company and may be shared amongst members of staff, as appropriate.
- 4.7. Thus, small gifts that are genuinely given as a token of appreciation are acceptable, provided always that you properly declare them in line with this Policy and provided you do not subsequently treat the sender of the gift more favourably than other clients, customers, suppliers or contractors.
- 4.8. An accurate record must be kept of all gift offers made to the Company or to employees of the Company by third parties. Records of any gifts received are to be held by the administration department.
- 4.9. The receipt of all gifts will be closely monitored by the Company.

### 5. Hospitality

- 5.1. "Corporate Hospitality", for the purposes of this policy, is any form of accommodation, entertainment or other hospitality provided for an employee of the Company by a third party and which is extended to the employee solely or significantly due to his position as a representative of the Company. This excludes the classes of hospitality particularised at paragraph 5.2 below.
- 5.2. For the purposes of this policy and for the sake of clarity, the following are not normally considered Corporate Hospitality and will not require any approval prior to acceptance:
  - 5.2.1. Normal working lunches or refreshments provided during a business visit;
  - 5.2.2. Hospitality extended to employees attending a Company approved seminar, conference or other external event, provided that such hospitality is extended to all who are in attendance;
  - 5.2.3. Free seminars, talks or workshops, provided that they are free to all in attendance and are not provided solely for employees of the Company.
- 5.3. All employees are required to obtain approval before accepting any form of Corporate Hospitality

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which is offered to them. Approval must be sought from a director.

- 5.4. An accurate record must be kept of all Corporate Hospitality offered to the Company or to employees of the Company. Any employee offered any form of Corporate Hospitality must record the activity on the respective weekly timesheet (QMA19) with a description of the hospitality offered.
- 5.5. The receipt of all Corporate Hospitality will be closely monitored by the Company.

### 6. Breach of this Policy

- 6.1. Compliance with this policy is essential to the protection of the Company's reputation and that of its employees. Any employee or associate person who is found to have acted in contravention of this policy or its principles may be subject to disciplinary action, including summary dismissal where the breach amounts to gross misconduct.
- 6.2. If the Company discovers that a supplier has been used by an employee wholly or mainly because of the incentive of a free gift (and, as such, the employee has not acted in the best interests of the Company), this will also constitute a disciplinary offence and will be dealt with under the Company's disciplinary procedure. Depending on the seriousness of the offence, it may again be treated as gross misconduct and could render the employee liable to summary dismissal.
- 6.3. Any employee or any associated person (as defined by Section 8 of the Bribery Act 2010) found giving or receiving bribes or bribing a foreign official will face criminal charges under the provisions of the Bribery Act 2010. Anyone found guilty of bribery, will be responsible for bearing any related remedial costs such as losses, court fees or expenses.

This policy has been endorsed by, and has the full support of the management & board. The policy was approved in April 2017.

Overall responsibility for the effectiveness of the policy lies with:

Ken Freckleton  
Managing Director  
GHM Partnership Ltd  
The Studio, 12 Church Street,  
Welwyn, Hertfordshire,  
AL6 9LX

Signed:



Date: 29<sup>th</sup> January 2019

Ken Freckleton  
Managing Director  
GHM Partnership Ltd