



<b>Policy:</b>	<b>Anti-Bribery &amp; Business Ethics</b>	<b>Reference:</b>	<b>ABBESES0077</b>
		<b>Review Date:</b>	<b>05/2022</b>

### **Purpose.**

This policy aims to set out SES Engineering (Newark) Ltds policy in relation to bribery and corruption.

### **Scope.**

The policy applies to employees directly employed by SES Engineering (Newark) Ltd, to workers employed via agencies, contractors in terms of employment and customers in terms of service provision. The policy applies specifically to the Bribery Act 2010. The act has a near-universal jurisdiction, allowing for the prosecution of an individual or company with links to the United Kingdom regardless of where the crime occurred.

### **Responsibilities.**

Acts of bribery or corruption are designed to influence an individual in the performance of their duty and incline them to act in a way that a reasonable person would consider to be dishonest in the circumstances.

Bribery can be defined as offering, promising or giving a financial (or other) advantage to another person with the intention of inducing or rewarding that person to act or for having acted in a way which a reasonable person would consider improper in the circumstances. Corruption is any form of abuse of entrusted power for private gain and may include, but is not limited to, bribery.

Bribes are not always a matter of handing over cash. Gifts, hospitality and entertainment can be bribes if they are intended to influence a decision.

### **Aims.**

It is our policy 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 wherever we operate and implementing and enforcing effective systems to counter bribery.

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

### **Policy.**

Bribery and corruption are punishable for individuals by up to 10 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.

We have identified that the following are particular risks for our business:

- Risks that may result from supplier or service provider relationships.
- Risks that may result from customer relationships.
- Risks that may result from personal relationships, in and outside of the business.

To address those risks we have:

- Established internal processes that govern the purchasing and supplier selection activities.
- Established internal processes that govern customer relationships as regards incentives, promotions, and hospitality.
- Established the relevant policies and processes that govern potential conflicts of interest.



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.

### **Gifts and Hospitality.**

This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties. Please obtain the approval of your line manager before incurring any expenditure for hospitality.

- The giving or receipt of gifts is prohibited, unless the following requirements are met:
- It is not made with the intention of influencing a third party to obtain or retain business advantage.
- It complies with UK law.
- It is given in our name, not in your name.
- It does not include cash or cash equivalent (gift vouchers or certificates) unless it is part of an authorised incentive scheme.
- It is appropriate in the circumstances. For example, a small gift to be given at Christmas time.
- Taking into account the reason for the gift, it is an appropriate type and value and given at an appropriate time.
- It is given openly, not secretly.

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 guidelines set out in this policy must be followed at all times as a priority over the regions practice.

What is **not** acceptable:

- Give, promise to give, or offer a payment, gift or hospitality with the expectation that a business advantage will be received.
- Accept payment, gift, or hospitality from a third party that you know, or suspect is offered with the expectation that it will obtain a business advantage for them.
- 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 activity that might lead to a breach of this policy.

### **Payments and Kickbacks.**

We do not make, and will not accept, facilitation payments or 'Kickbacks' of any kind. 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 SES Engineering (Newark) Ltd.

### **Your Responsibility.**

- You must ensure that you read, understand, and comply with this policy.
- The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all employees and sub-contractors under our employment. All employees are required to avoid any activity that might lead to or suggest a breach of this policy.
- You must notify your line manager as soon as possible if you believe or suspect that a conflict with this policy has occurred.
- Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct.