Form Title: Bribery Policy
Form Ref: POL 009
Author: PRB Consulting
Date: October 2022
Version: V3.0

BRIBERY POLICY

The Bribery Act 2010, which came into force on 1 July 2011, creates a new offence which can be committed by commercial organisations which fail to prevent persons associated with them from bribing another person on their behalf.

The Act provides

A general offence of bribery, which is defined as giving someone a financial or other advantage to induce them to perform their functions or activities improperly, or to reward them for having already done so

An offence of bribing a foreign public official in order to win business, keep business or gain a business advantage for the organization

An offence relating to failure by a business to prevent a person associated with it from committing the above offences on its behalf in order to win business, keep business or gain a business advantage for the organisation.

To prevent bribery, we should:

- Assess whether business is at risk and, if so, the level of that risk put in place procedures proportionate to the risk identified
- Show a clear commitment to the prevention of bribery
- Use due diligence to assess who we are dealing with and who we appoint to represent us, communicate, train and raise awareness among employees and business partners to monitor and review procedures

Genuine hospitality or similar business expenditure that is reasonable and proportionate is not prohibited by the Act.

The following is a list of possible red flags that may arise during the course of you working for us and which may raise concerns under various anti-bribery and anti-corruption laws. The list is not intended to be exhaustive and is for illustrative purposes only. If you encounter any of these red flags while working for us you must report them promptly to the Managing Director:

You become aware that a third party engages in, or has been accused of engaging in, improper business practices;

You learn that a third party has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a "special relationship" with foreign government officials:

- A third party insists on receiving a commission or fee payment before committing to sign up to a contract with us, or carrying out a government function or process for us
- A third-party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made
- A third-party request that payment is made to a country or geographic location different from where the third party resides or conducts business
- A third party requests an unexpected additional fee or commission to "facilitate" a service
- A third-party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services
- A third-party request that a payment is made to "overlook" potential legal violations
- A third-party request that you provide employment or some other advantage to a friend or relative
- You receive an invoice from a third party that appears to be non-standard or customised
- A third party insists on the use of side letters or refuses to put terms agreed in writing
- You notice that we have been invoiced for a commission or fee payment that appears large given the service stated to have been provided
- A third party requests or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to us
- You are offered an unusually generous gift or offered lavish hospitality by a third party

PRB Consulting Controlled & Published Document 2020

Form Title: Bribery Policy
Form Ref: POL 009
Author: PRB
Date: Consulting
Version: October 2023
V30

Signed: 

Dean Jump
Role: Managing Director

Date: October 2026

PRB Consulting Controlled & Published Document 2020