



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TITLE: Anti-Bribery and Corruption Policy		
COMPILED BY: CS		DATE ISSUED: 01/12/2023
REVISED BY:	APPROVED BY: 	DATE: 01/12/2023
MANAGER REVIEW	Ross Litchfield	QUALITY REVIEW 

## **Tidyco Limited: Anti-Bribery and Corruption Policy**

### **1. Introduction**

1.1. The purpose 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, providing clear information, guidance and rules regarding appropriate behaviour around bribery and corruption, which if breached are punishable by imprisonment, criminal charges and fines.

### **2. Purpose and Scope**

2.1. Tidyco Ltd prides itself on upholding the highest standards in conducting its business affairs 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. We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate, but are governed by the law of England, including the Bribery Act 2010.

### **3. Procedure**

- 3.1. As a company, we seek to establish and follow clear ethical standards that set us apart in the way we do business with our customers and suppliers. We expect our employees and representatives to exhibit similar personal ethical standards in the manner in which we conduct ourselves as individuals. In the interests of clarity, this Policy therefore applies to all persons working for us or on our behalf in any capacity, including employees, at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external contractors, third party representatives and business partners.
- 3.2. If an employee takes any action that is inconsistent with the rules or the standards of behaviour reflected in this Policy, the Company has the responsibility to act to correct the matter. In every case a misconduct or breach will be investigated and may, dependent on the outcome of the investigation, be subject to the procedure contained within the company's Disciplinary Policy.
- 3.3. Employees are prohibited from selling or attempting to sell company products or services or to gain any improper concessions for the company by giving any bribe, kickback payment, gift, loan or special favours to customers. All forms of indirect payments are prohibited.

### **4. Bribery**

- 4.1. A bribe is an inducement or reward offered, promised, provided, given, accepted or sought in order to gain any commercial, contractual, regulatory or personal advantage. THIS IS AN ILLEGAL ACT
- 4.2. There are four offences:
- Bribing another person;
  - Being bribed;
  - Bribing a foreign public official; and
  - Failure of a commercial organisation to prevent bribery.

Three examples appear below:

### **Offering a bribe**

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

*This would be an offence as you are making the offer to gain a commercial and contractual advantage. The company may also be found to have committed an offence because the offer has been made to obtain business. 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 the company 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 company to pay an additional payment to a foreign official to speed up an administrative process, such as clearing goods through customs.*

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.

## **5. Gifts and Hospitality**

- 5.1. Tidyco Ltd's employees should not accept or offer gifts, loans or favours to or from an individual or firm doing business or seeking to do business with the company that may create or appear to create a favoured position or be seen as a bribe or inducement.
- 5.2. Individuals should apply their discretion when offering or accepting entertainment to or from an individual or firm doing business or seeking to do business with the company. Care should be taken to ensure the entertainment is appropriate, i.e. reasonable and justifiable, and could not be construed as a bribe or inducement. If offering, or being offered, gifts or hospitality, this must first be authorised by the Managing Director before an offer or acceptance is given.
- 5.3. Reasonable and proportionate hospitality and entertainment for customers and suppliers does form part of the Company's normal business dealings. This Policy does not prohibit the giving or acceptance of reasonable and appropriate hospitality for legitimate purposes such as building relationships, maintaining the business image or reputation, or marketing the products and services. All hospitality exchanges must be agreed in advance by your appropriate Director using the Corporate Hospitality/Gift Authorisation form. If you have any concerns that an offer or receipt of hospitality may be viewed as a bribe or inducement, then **please seek guidance from your Director / Managing Director in advance of the planned event.**

## **6. What is not acceptable**

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; or
- Engage in any activity that might lead to a breach of this policy.

## **7. Facilitation Payment and Kickback Payments**

- 7.1. 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 jurisdictions.
- 7.2. 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 manager / director.
- 7.3. 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.

## **8. Competition Law and the Enterprise Act**

- 8.1. Tidyco Ltd is committed to free, open and ethical competition and our policy is to comply with all aspects of competition law and the enterprise act. These laws affect virtually every part of our operations, our relationships with clients, suppliers, competitors and almost all others with whom we deal. Basically, these laws require that each company should act independently and sell its products fairly and honestly on the basis of price, quality and service.
- 8.2. UK competition law prohibits commercial activity which restricts competition or abuses power through market dominance.

## **9. Breaches of the Policy**

- 9.1. Serious breaches of any of the rules within this policy, or an equivalent incident, will be considered to be gross misconduct. This may include authorising or encouraging other employees to act inappropriately or turning a blind eye to the inappropriate actions of others.
- 9.2. Where gross misconduct is alleged the Disciplinary Policy will be instigated, which may require the employee to be suspended from work.
- 9.3. Where serious incidents are proven, the police may be informed where appropriate.

## **10. Raising Concerns**

Anyone wishing to raise a concern can do so by emailing [personnel@tidyco.co.uk](mailto:personnel@tidyco.co.uk) or by writing to the Personnel Department, Unit 2 Pentagon Island, Nottingham Road, Derby, DE21 6BW.

*NB: A summarised version of this policy and guidance to staff is enclosed within the Company Handbook.*