

## **Anti-Bribery Policy**

### **Introduction**

Surbon Consulting is committed to implementing and enforcing effective systems to counter bribery. It is always our policy to conduct all aspects of our business in an honest and ethical manner. Our objective is to ensure that the reputation, trust and confidence in Surbon Consulting is maintained and protected at all times. This policy applies to all consultants working for Surbon Consulting including anyone providing services to Surbon Consulting.

### **Policy Aim**

The aim of this policy is to help Surbon Consulting act in accordance with the UK Bribery Act 2010, maintain the highest possible standards of business practice, and zero-tolerance approach to bribery and corruption.

### **The Law**

Under UK law (UK Bribery Act 2010), bribery and/or corruption is punishable for individuals by up to ten years' imprisonment. If Surbon Consulting is found to have taken part in the corruption or lacks adequate procedures to prevent bribery, sanctions could include an unlimited fine and be excluded from tendering for Government contracts.

### **Policy Statement**

Surbon Consulting will not:

- Make contributions of any kind with the purpose of gaining any commercial advantage.
- Provide gifts or hospitality with the intention of persuading anyone to act improperly, or to influence a public official in the performance of their duties.
- Make, or accept, "kickbacks" of any kind.

Surbon Consulting will:

- Keep appropriate internal records that will evidence the business reason for making any payments to third parties.
- See that anyone raising a concern about bribery will not suffer any detriment as a result, even if they turn out to be mistaken.

### **Monitoring Policy**

The policy will be monitored on an on-going basis to ensure that it addresses issues effectively.

### **Common forms of corruption**

#### **Bribery**

Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision. A bribe refers to any inducement, reward, or object/item of value offered to another individual in order to gain commercial, contractual, regulatory, or personal advantage.

Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law.

Bribery is illegal. Employees and consultants acting for Surbon Consulting must not engage in any form of bribery, whether it be directly, passively (as described above), or through a third party (such

as an agent or distributor). They must not bribe a foreign public official anywhere in the world. They must not accept bribes in any degree and if they are uncertain about whether something is a bribe or a gift or act of hospitality, they must seek further advice from the owner of Surbon Consulting.

### **Business gifts**

Receiving Business gifts – Offering and receiving promotional gifts of low value is normal and appropriate, however, gifts with a value exceeding £100 or equivalent may not be accepted without approval. Any gift offered and then refused because of its value, must be reported.

### **Hospitality**

Hospitality is primarily aimed at thanking customers and suppliers for their custom and loyalty. The acceptance of corporate hospitality must be transparent; all invitations must be reported to the company before an employee accepts any invitation. The following areas are exempt while attending conferences, seminars, sponsored by third parties;

- business and travel expenses incurred
- normal business lunches and meals

### **Kickbacks or facilitation payment**

Typically, small payments made in return for a business favour or advantage with a view to speeding up routine governmental transactions to which the payer is already entitled. They are illegal in most countries. They also undermine good governance, and a willingness to make them often leads to demands for larger, more significant payments.

### **Consequences of corruption**

Corruption is illegal and penalties can be severe. Turning a blind eye is no defence to corruption. The impact on business and operations will be negative, whether through direct or indirect involvement and result in:

- Irreparable reputational damage
- Debarment from operating in certain jurisdictions
- Exclusion from certain private tenders and projects
- Termination of existing contracts
- Damage to employee morale

### **Action when confronted with corruption**

If an employee or consultant of Surbon Consulting receives a request for a bribe, facilitation payment or kickback, they will politely refuse to carry out the request. They will be required to make a detailed record of the event and report the incident to the owner of Surbon Consulting as soon as possible. The reporting party doesn't have to identify themselves, but can remain anonymous, where permitted by law.

### **Reviewing Policy**

This policy will be reviewed on an annual basis. Improvements will be made by learning from experience and the use of an annual review.