

# ANTI-BRIBERY POLICY

## Definition

Bribery is the accepting of gifts, money, hospitality or other favours in return for providing something of value to the briber. The purpose of this policy is to set out the rules that must be followed by all employees of Connaught Resourcing to ensure that no bribery occurs.

## Unacceptable behaviour

The following behaviour is unacceptable, and must not occur in this organisation:

- accepting any financial or other reward from any person in return for providing some favour
- requesting a financial or other reward from any person in return for providing some favour
- offering any financial or other reward from any person in return for providing some favour.

## Business gifts

From time to time, customers, suppliers or other persons might offer a gift to an employee. This could be a small item, or something of considerable value. All gifts, however small, must be reported to the Commercial Manager and recorded. No gifts may be accepted. If a gift is offered and then refused it must be reported to the Commercial Manager.

## Hospitality

From time to time, customers, suppliers or other persons might invite an employee to a hospitality event. All such invitations must be reported to the Commercial Manager. Permission must be given by the Commercial Manager before an employee accepts any invitation.

## Offering gifts and hospitality

Connaught Resourcing may offer small gifts (eg pens, diaries) to customers, suppliers and other persons. If a gift is authorised by the Commercial Manager the employee is entitled to give it to the appropriate individuals. A record must be kept of all gifts.

Connaught Resourcing occasionally runs hospitality events, primarily aimed at thanking customers and suppliers for their custom and loyalty. An employee must not organise any additional hospitality event without seeking authority from the Commercial Manager.

## Attempts to bribe

Any employee who is concerned that he or she is potentially being bribed should report this matter to the Commercial Manager immediately.

## Disciplinary action

Any employee found to have offered or accepted a bribe will face disciplinary action which could include dismissal for gross misconduct.

## Raising concerns

If an employee is concerned that acts of bribery are occurring in Connaught Resourcing they should inform the Commercial Manager in the first instance.