

WDS-QMP-104	<b>Anti-Bribery &amp; Corruption Policy</b>			Rev 1	Pg 1 of 4
Issued by:	JAD	Date:	01/Nov/2021	Approved:	JAD

## Anti-Bribery & Corruption Policy

### 1 Introduction

Warley Design Solutions values its reputation and is committed to maintaining the highest level of ethical standards in the conduct of its business affairs. The actions and conduct of the company's staff as well as others acting on the company's behalf is key to maintaining these standards.

The purpose of this document is to set out the company's policy in relation to bribery and corruption. The policy applies strictly to all employees, directors, agents, consultants, contractors and to any other people or bodies associated with Warley Design Solutions.

### 2 Understanding and recognising bribery and corruption

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.

A detailed description of Bribery and Corruption is given within the Bribery Act 2010 [Ref 1].

### 3 Penalties

The Bribery Act 2010 states that bribery by individuals is punishable by up to ten years' imprisonment and/or an unlimited fine. Without adequate procedures to prevent bribery, Warley Design Solutions may too be found guilty, and this could have severe reputational and/or financial consequences for the company.

### 4 Warley Design Solutions' policy

Warley Design Solutions will not tolerate bribery or corruption in any form.

The company prohibits the offering, giving, solicitation or the acceptance of any bribe or corrupt inducement, whether in cash or in any other form:

- to or from any person or company wherever located, whether a public official or public body, or a private person or company;

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- by any individual employee, director, agent, consultant, contractor or other person or body acting on the company's behalf; in order to gain any commercial, contractual, or regulatory advantage for the company in any way which is unethical or to gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.

This policy is not intended to prohibit the following practices provided they are appropriate, proportionate, not concealed and are properly recorded:

- hospitality (e.g. meals) provided they are considered to be normal within the industry
- the receiving of low-value promotional gifts such as calendars and pens
- the receiving of low-value seasonal gifts such as biscuits and beverages.

By way of illustration, a gift from a key supplier of a bottle of a desk diary or a tin of biscuits at Christmas can be considered to be normal within the industry, and as such is not considered to be a bribe.

It may not always be a simple matter to determine whether a possible course of action is appropriate. If you are in any doubt as to whether a possible act might be in breach of this policy or the law, the matter should be referred to a director of the company. The company encourages communication in this respect.

The company will investigate thoroughly any actual or suspected breach of this policy, or the spirit of this policy. Employees found to be in breach of this policy may be subject to disciplinary action such as dismissal or contract termination.

## **5 Risk assessment / key risk areas**

Warley Design Solutions chooses suppliers of goods and services on behalf of our clients. When those products or services are supplied in volume it can be very lucrative for the supplier. Below are the key areas you should be aware of in particular:

- Excessive gifts, entertainment and hospitality: can be used to exert improper influence on decision makers, especially by providers of goods or services.
- Reciprocal agreements: or any other forms of 'quid pro quo' are never acceptable unless they are legitimate business arrangements which are properly documented and approved by management. Improper payments to obtain new business, retain existing business or secure any improper advantage should never be accepted or made.
- Actions by third parties for which the company may be held responsible: can include a range of people i.e. agents, contractors and consultants, acting on the company's behalf. Any payments or purchases made by third parties on behalf of the company needs to be made through the company purchasing system which ensures that purchases are properly authorized and recorded.

## **6 Employee responsibility and how to raise a concern**

The prevention, detection and reporting of bribery or corruption is the responsibility of all employees, contractors and agents working on behalf of the company. If you become aware or suspect that an activity or conduct which is proposed or has taken place is a bribe or corrupt, then you have a duty to report this to the company Director responsible for upholding the policy.

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## 7 Employee awareness and acceptance

The company will ask all key staff to sign a record which acknowledges the awareness of this policy and of the Bribery Act 2010 [Ref 1].

The record of acknowledgement [Ref 2] will be kept with the company' Quality Management System at:

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A sample of the acknowledgement checklist is provided as an Appendix to this document.

## 8 References and Applicable Documents

[1] The Bribery Act 2010, published by The UK Government's Ministry of Justice.

[2] QMS-1587-*nn*, < where *nn* is the latest issue > Bribery and Corruption Awareness Acknowledgement. A template for the checklist is provided in the Appendix.

The policy review date is 01/Nov/2024

**John Durban**

**Director**

Signed:



**Date: 01/Nov/2021**

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**Appendix: Example of Bribery & Corruption Policy Acceptance form, QMS-1587-*nn***

Please date sign to acknowledge acceptance of WDS' bribery and corruption policy

Name (capitals)	Acceptance of WDS-QMP-104: Anti-bribery & Corruption Policy		Training on "Bribery Act 2010"	
	Signature	date	Signature	date
<u>Example:</u> A N Other	<i>A N Other</i>	<i>25-Dec-21</i>	<i>A N Other</i>	<i>29-Feb-21</i>