

Bribery and Corruption Policy

Introduction

It is Bridges Policy to conduct business in an honest way and without the use of corrupt practices or acts of bribery to obtain an unfair advantage. We are dedicated to ensuring full compliance with all anti-bribery laws and regulations and will not engage in any form of bribery or corruption. This applies to all employees, sub-contractors, suppliers and any person or company with whom we conduct business. This policy prohibits the offering, the giving, the solicitation or the acceptance of any bribe, whether cash or other inducement.

Definitions

Bribery – The offer, promise, giving, demanding or accepting of an advantage as an inducement for an action which is illegal, unethical or a breach of trust. The bribe can be the direct or indirect promise of gifts, money or anything of value.

Corruption – The misuse of public office or power for private gain; or misuse of private power in relation to business outside of the realm of government. Corruption could be an employee using their position or influence in the company to ignore normal selection procedures and favour one contractor or supplier above others.

Legislation

This is not just a cultural commitment on the part of the organization but it is a moral issue and legal requirement. Bribery is a criminal offence and penalties can be severe. In the UK the Bribery Act 2010 not only makes corruption and bribery illegal but also holds companies liable for failing to enforce adequate measures to prevent such acts by those working for the company or on its behalf.

The four key offences in the Act relate to

- Bribery of another person
- Accepting a Bribe
- Bribing a foreign official
- Failing to prevent bribery

Bribery of Another Person

This offence is committed if a person (individual or company) offers, promises or gives a financial or other advantage to another person as a bribe. This could be in order to either reward a person for improper performance of a relevant function or activity or because they know or believe the acceptance of such advantage would lead to this improper performance.

Accepting a Bribe

This offence is committed where a person (individual or company) requests, agrees to receive or accepts a financial or other advantage as a bribe. This is where the acceptance of the advantage itself constitutes the improper performance of a relevant function or activity and where an advantage is given as a reward for improper performance.

In both of the above cases it is important to note that a bribe can include money , gift or promise of something of value or advantage and need to be of large value and it need not be for your personal benefit, for example a sub-contractor making a donation to your favorite charity could be considered a bribe.

Bribing a Foreign Official

It is an offence for a person (individual or company) to bribe a foreign official. The offence is committed if the person offering/giving the bribe intends to try and influence the foreign public official in the performance of their official duties in order to obtain business or an advantage in the conduct of their business.

Failing to Prevent Bribery

A commercial organisation is guilty of this offence if a person associated with the organisation bribes another person with the intent to obtain or retain business for the company or to obtain or retain an advantage in the conduct of business. For this offence it is irrelevant whether the person was acting upon the companies' wishes or if the company is aware of the bribery committed. However this only applies if the company cannot prove that they had in place adequate procedures designed to prevent persons associated with the company from undertaking such conduct.

Facilitations Payment

Bridges do not accept and will not make facilitation payments of any kind. These are typically small unofficial payments made to secure or expedite a routine government action.

All employees should be vigilant whenever asked to make a payment on Bridges behalf. You should always be mindful of what you are paying for and whether the amount is proportionate to the goods or services provided. You should also always ask for a receipt which details the goods/services which are provided and the amount paid. If you have any suspicions, concerns or queries regarding a payment of any kind you should raise these with Steve Spencer – Director.

Gifts and Hospitality

This policy does not prohibit what is deemed to be appropriate hospitality. This includes being given and received to and from Bridges and third parties to cement business relationships and enhance

knowledge of people, services and products. The giving or receipt of gifts and hospitality is therefore not prohibited as long as the following requirements are met:

- It is disclosed to your line manager in advance (where it is possible to do so or as soon as possible afterwards)
- It is not done with the intention of influencing, inducing or rewarding a third party in order to gain any advantage through improper performance, or in explicit or implicit exchange for favours or benefits.
- Comply with any applicable laws
- It must not be in cash
- It must be in good faith, occasional and reasonable.
- It is given openly and not secretly

Donations

Bridges will not make donations to any political parties, political candidates or any of their affiliated organisations. We will only make charitable donations that are made legally and ethically. Charitable contribution should therefore be given with the expectation that no advantage or benefit is made by Bridges.

How to Raise Concern

We encourage all staff to raise concerns about any issues or suspicions of potential bribery at the earliest possible stage. If you are unsure if a certain act constitutes bribery or if you have any other queries relating to this matter it should be raised with your line manager.

Workers who refuse to accept a bribe or those who raise concerns about a colleague's wrong doing are often worried about the repercussions. Bridges therefore aim to encourage openness and will support anyone who raises genuine concern in good faith, even if it turns out to be a misunderstanding.

Any employee or other party who falls under the jurisdiction of the company will be subject to disciplinary action if they are found to be in breach of this policy. Disciplinary action could lead to termination of contract, criminal prosecution of both.

Monitoring, Reviewing and Breaching the Policy

- It is the responsibility of senior management to ensure that this policy is implemented throughout the organization and to ensure that this policy is properly maintained and up to date.
- All employees are responsible for the success of this policy and should abide by its requirements at all times
- All employees can comment on this policy and suggest ways in which it may be improved. Comments, suggestions and queries should be addressed to Steve Spencer – Director.

- This policy must be reviewed annually
- Breaching the UK Bribery Act carries severe penalties: an unlimited fine and/or up to 10 year's imprisonment.
- Bridges will consider any breach of this policy a serious offence and any violation to it will result in disciplinary action and could lead to dismissal in appropriate circumstances

Training

All members of the senior management team will be expected to complete online training on bribery and corruption and to renew this on a 3 year basis.

This policy has been approved & authorised by:

Name: Rachael Kendall

Position: HR Manager

Date: 5th March 2024

Review date : 5th March 2025



Signature: