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| **Document Approval** |
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1. **Purpose and Scope**

It is Westdale Group policy to conduct all of our business in an honest and ethical manner. We have a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our dealings wherever we operate.

The Bribery Act 2010 came into force in July 2011 and creates various new offences, including offences which can be committed by a commercial organisation that fails to prevent persons associated with that organisation from committing bribery on their behalf.

Westdale Group and its Directors are committed to the prevention of bribery by those employed and associated with it.

This policy applies to all those employed by and associated with Westdale Group and extends to all Westdale activities and operations and to all of its dealings and negotiations with third parties.

Westdale are committed to ensuring that its business is conducted in an open and transparent manner and will adhere to the principles of bribery prevention and will take all appropriate steps to address the risks of bribery. Any cases brought to the company’s attention will be dealt with appropriately.

1. **Responsibilities**

This policy applies to all individuals including senior managers, directors, employees (fixed term & temporary) consultants, suppliers, contractors and any other person providing a service to the company.

1. **Reference Documents**

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1. **Revision Changes**

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| **Review Date** | **Revision No.** | **Brief Description of Changes** |
| 21/07/2020 | 2 | Annual review |
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1. **Procedure**

**Offering or Accepting Bribes**

A bribe is a financial or other advantage offered or given to anyone to persuade them to or performing their duties improperly or, to any public official with the intention of influencing the official in the performance of his duties. It is commonly described as the offer or acceptance of a reward to persuade another to act dishonestly and or in the breach of law. It includes the offering, promising, giving, receiving or soliciting of financial, academic or other advantage or favour as a means to influence the actions of an individual.

The Bribery Act 2010 provides for four bribery offences:-

* Bribing: offering, promising or giving an advantage;
* Being bribed: requested, agreeing to or accepting an advantage;
* Bribing a foreign official;
* Failing as an organisation to prevent any person who performs services on its behalf from committing an act of bribery.

**Action in the Event of Bribery**

All cases of actual or suspected bribery will be promptly investigated and appropriate action will be taken. Westdale Group prohibits any employee (or person associated with it) from accepting, offering, promising or giving any financial or other advantage to another person where it is intended that advantage will bring about improper performance by another person. “Another person” can include any UK or foreign national.

**Hospitality and Business Gifts**

This policy does not prohibit giving and receiving promotional gifts of low value and normal and appropriate hospitality, however in certain circumstances gifts and hospitality may amount to bribery and all employees must comply strictly with Westdale Group’ policy in respect of gifts and hospitality.

We will not provide gifts or hospitality with the intention of persuading anyone to act improperly or to influence a public official in the performance of his duties.

We will not make or accept any payments of any kind made in return for a business favour or advantage.

All employees must avoid any activity that might lead to the above. No charitable contributions will be made for the purpose of gaining any commercial advantage. We will keep financial records and have appropriate internal controls in place which will evidence the business reason for making any payments to third parties.

All accounts, invoices & other documents and records relating to dealings with third parties such as clients, suppliers & business contacts, must be prepared and maintained with strict accuracy and completeness. No accounts must be kept ‘off-book’ to facilitate or conceal improper payments.

Westdale Group prohibits the giving and receiving of hospitality / business gifts and similar where the intention in doing so is to receive or confer an advantage in return for giving or receiving the hospitality / business gift or similar.

The following procedures should be adopted in relation to hospitality and business gifts;

1. All offers of business gifts should be referred to a Director and should only be accepted if clearance has been received.
2. Business gifts should not be made without the permission of a Director.
3. Cash gifts are prohibited.
4. The provision of small promotional gifts, such as diaries, pens, calendars or similar, will generally be regarded as acceptable. If you are in any doubt you should contact a Director.
5. Westdale Group prohibits facilitation payments of any sort. Facilitation payments are small bribes paid to speed up government process. Although they are common place in some foreign countries, they are illegal under the Bribery Act 2010.

If you are in any doubt you should contact a Director to report your concerns.

**Reporting Concerns**

All members of staff have a responsibility to ‘Prevent, Detect, Report.’

All instances of bribery, including the possibility of bribery, and any concerns should be reported to a Director.

**Training and Communication**

A copy of the policy will be published on the Westdale Group SHEQ Management System. All staff are expected to familiarise themselves with the Anti Bribery Policy. Changes to the policy and procedures will be communicated to staff in an appropriate manner.

This policy is not confidential: Staff are encouraged to disclose and refer to Westdale Group Bribery Policy in their dealings with other parties, especially dealing with potential new business.

Westdale Group treats breaches of the Bribery Policy seriously and will investigate any potential breach in accordance with the disciplinary policy. The ultimate sanction for a breach of policy will be summary dismissal for gross misconduct.