

# Oliver Ashworth Bribery Act 2010 Policy Statement

HRP003 – Version 3 – Reviewed October 2023



**ASHWORTH**  
PEOPLE - PRODUCTS - SERVICE

# Bribery Act 2010

## Policy Statement

### I. Policy

- 1.1 It is the Company's policy to conduct all of its business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.
- 1.2 We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. However, we remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both at home and abroad.
- 1.3 Bribery and corruption are punishable for individuals by up to ten years' imprisonment and if we are found to have taken part in corruption we could face an unlimited fine as well as adverse publicity and damage to our reputation.

### II. What is bribery?

- 2.1 A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

### III. Gifts and Hospitality

- 3.1 Our policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties.
- 3.2 We appreciate that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift must always be considered.

### IV. Facilitation Payments and "Kickbacks"

- 4.1 We do not make, and will not accept, facilitation payments or "kickbacks" of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. They are not commonly paid in the UK but are common in some other jurisdictions in which we may operate.

### V. Donations

- 5.1 We do not make contributions to political parties. We only make charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made without the prior approval of the Finance Director.

### VI. Record Keeping

1.4 Our Company will keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

1.5 Our employees and agents must declare and keep a written record of all hospitality or gifts accepted or offered, which will be subject to managerial review.

1.6 Our employees and agents must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with our expenses policy and specifically record the reason for the expenditure.

## **VII. Raising a concern**

7.1 We encourage all employees and business partners to report any issue or suspicion of malpractice at the earliest possible stage.

## **VIII. Who is responsible for the Policy?**

8.1 The Managing Director is responsible for implementing this policy in the business and ensuring that their management at all levels and those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

## **IX. Monitoring and Review**

9.1 The Finance Director will monitor the effectiveness and review the implementation of this policy at least three times a year, and consider its suitability, adequacy and effectiveness. Any changes will be implemented as soon as possible after they are identified. Internal control systems and procedures will be subject to audits by Business Controls to provide assurance that they are effective in countering bribery and corruption.



Brian Smithers  
Managing Director