



Anti-Bribery & Corruption Policy

Introduction

It is our policy to always conduct our business in an honest and ethical manner. We take a “zero-tolerance” approach to bribery and corruption within the Briggs Group. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships and implementing and enforcing effective systems to counter bribery.

The Law

The Bribery Act 2010 came into force on 1 July 2011. Under the Act, it is: -

- an offence for a person to offer, promise or give a financial or other advantage to another person.
- an offence for a person to offer, promise or give a financial or other advantage to a foreign public official with the intention of influencing the official in the performance of official functions.
- an offence for a commercial organisation to fail to prevent bribery being committed on their behalf.

Policy Statement

Briggs Group prohibits: -

- the offering, the giving, the solicitation, or the acceptance of any bribe, whether cash or other inducement to or from any person or company, wherever they are situated and whether they are a public official or body or private person or company
- any individual employee, agent or other person or body acting on the Group’s behalf to gain any commercial, contractual, or regulatory advances for the Group in a way which is unethical or to gain any personal advantage, financial or otherwise, for the individual or anyone connected with the individual.



Policy Responsibility

The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Line Managers at all levels are responsible for ensuring those reporting to them is made aware of and understand this policy. Employees must ensure that they read, understand, and comply with this policy.

Breach of the Policy

Any breach of the policy may result in disciplinary action up to and including dismissal with immediate effect for gross misconduct. In the case of contractors and other non-employees, breach of this policy may result in termination of their engagement.

Clarifications

Definition

A bribe is an inducement, payment, reward, or advantage offered, promised, or provided to gain any commercial, contractual, regulatory, or personal advantage. A bribe may be anything of value, and not just money, such as: -

- gifts
- corporate hospitality or entertainment
- payment or reimbursement of travel expenses
- charitable donation or social contribution

Gifts and Hospitality

This policy does not prohibit normal and appropriate gifts, hospitality, entertainment and promotional or other similar business expenditure, such as calendars, diaries, meals and invitations to arts and sporting events (given or received).

To avoid committing a bribery offence, the gift or hospitality must: -

- be reasonable and justifiable in all the circumstances.
- have the intention to improve the image of the Group, better present our products and services, or establish relationships.



Facilitation Payments and Kickbacks

Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. Kickbacks are typically payments made to commercial organisations in return for a business favour or advantage, such as a payment made to secure the award of a contract.

We do not make, and will not accept, facilitation payments or kickbacks of any kind.

Procedures

Communication

This policy and guidance will be communicated to all employees across the Group through our established internal communication channels.

All employees must ensure that they read, understand, and comply with this policy. Any doubts or concerns should be discussed with Line Manager's.

Risk Assessment

Briggs is committed to the use of formal HIRA risk management techniques. As part of this, local management will engage in risk assessment to assess the nature and extent of exposure to potential external and internal risks of bribery.

Written records must be kept of all risk assessments undertaken.

Due Diligence

Due diligence will be carried out prior to engaging any associated persons or companies, proportionate to the identified risk. Appraisal and continued monitoring of engaged associated persons or companies will be undertaken where required.

Written records must be kept of all due diligence undertaken.





Other Record Keeping

For all hospitality or gifts accepted or given, other than token gestures and modest meals, employees must obtain the prior written approval of their Line Manager. The hospitality or gift must be recorded in the Gift and Hospitality Register, held by the Finance Team at Seaforth House.

All expenses claims relating to gifts, hospitality or other expenses incurred to third parties must be submitted in accordance with our Travel & Expenses Policy, and specifically record the reason for the expenditure.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers, and business contacts, should be prepared and maintained with strict accuracy and completeness.

Reporting

It is the responsibility of every employee to advise their Line Manager as soon as possible if they are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that they are a victim of another form of corruption or other unlawful activity.

Briggs Group encourages openness and will support anyone who raises genuine concerns under this policy, even if they turn out to be mistaken.

Briggs is committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption or reporting in good faith their suspicions.

Monitoring and Review

Responsibility for monitoring the effectiveness and reviewing the implementation of this policy, regularly considering its suitability, adequacy, and effectiveness, lies with the Group Financial Director and the Finance Team.





Direction of Queries

Any issues relating to this Policy not expressly covered in this document should be referred in writing to the Group Financial Director in the first instance.

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