

## **acl consulting - Anti bribery policy**

### *Introduction*

One of our core values is to uphold responsible and fair business practices. As a consortium and as individual companies, we are committed to promoting and maintaining the highest level of ethical standards in relation to all of our business activities. Our reputation for maintaining lawful business practices is of paramount importance and this Policy is designed to preserve these values. We therefore have a zero tolerance policy towards bribery and corruption and are committed to acting fairly and with integrity in all of our business dealings and relationships and implementing and enforcing effective systems to counter bribery.

### *Purpose and scope of Policy*

This Policy sets out our position on any form of bribery and corruption and provides guidelines aimed at:

- ensuring compliance with anti-bribery laws, rules and regulations, not just within the UK but in any other country within which we or any subcontractor associated with us may carry out business or in relation to which business may be connected
- enabling persons associated with us to understand the risks associated with bribery and to encourage them to be vigilant and effectively recognise, prevent and report any wrongdoing, whether by themselves or others
- providing suitable and secure reporting and communication channels and ensuring that any information that is reported is properly and effectively dealt with
- creating and maintaining a rigorous and effective framework for dealing with any suspected instances of bribery or corruption.

This Policy applies to all permanent and temporary employees associated with acl consulting (including any of its intermediaries, subsidiaries or associated companies). It also applies to any individual or corporate entity associated with us or who performs functions in relation to, or for and on our behalf including, but not limited to, directors, agency workers, casual workers, contractors, consultants, seconded staff, agents, suppliers and sponsors ("associated persons"). All employees and associated persons are expected to adhere to the principles set out in this Policy.

### *Legal obligations*

The UK legislation on which this Policy is based is the Bribery Act 2010 and it applies to our conduct both in the UK and abroad. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

It is an offence in the UK to:

- offer, promise or give a financial or other advantage to another person (i.e. bribe a person), whether within the UK or abroad, with the intention of inducing or rewarding improper conduct
- request, agree to receive or accept a financial or other advantage (i.e. receive a bribe) for or in relation to improper conduct
- bribe a foreign public official.

Individuals can be held personally liable for any such offence.

It is also an offence in the UK for an employee or an associated person to bribe another person in the course of doing business intending either to obtain or retain business, or to obtain or retain an advantage in the conduct of business. Individual companies can be liable for this offence where it has failed to prevent such bribery by associated persons. As well as an unlimited fine, companies can suffer substantial reputational damage.

#### *Policy statement*

All employees and associated persons are required to:

- comply with any anti-bribery and anti-corruption legislation that applies in any jurisdiction in any part of the world in which they might be expected to conduct business
- act honestly, responsibly and with integrity
- safeguard and uphold the Company's core values by operating in an ethical, professional and lawful manner at all times.

Bribery of any kind is strictly prohibited. Under no circumstances should any provision be made, money set aside or accounts created for the purposes of facilitating the payment or receipt of a bribe.

We recognise that industry practices may vary from country to country or from culture to culture. What is considered unacceptable in one place may be normal or usual practice in another. Nevertheless, a strict adherence to the guidelines set out in this Policy is expected of all employees and associated persons at all times. If in doubt as to what might amount to bribery or what might constitute a breach of this Policy, refer to the Director of your employing company within the acl consortium.

The giving of *de minimis* business gifts to clients, customers, contractors and suppliers is not prohibited provided the following requirements are met:

- the gift is of a minor or trivial nature and of no significant intrinsic value
- it is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage
- it complies with local laws

- it is given in the name of acl or one of its constituent companies, not in the giver's personal name
- it does not include cash or a cash equivalent (such as gift vouchers) and is not readily convertible to cash
- it is of an appropriate and reasonable type and value and given at an appropriate time
- it is given openly, not secretly
- it is approved in advance by a director of one of acl's constituent companies.

In summary, it is not acceptable to give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given, or to accept a payment, gift or hospitality from a third party that you know or suspect is offered or provided with the expectation that it will obtain a business advantage for them.

Any payment or gift to a public official or other person to secure or accelerate the prompt or proper performance of a routine government procedure or process, otherwise known as a "facilitation payment", is also strictly prohibited. Facilitation payments are not commonly paid in the UK but they are common in some other jurisdictions.

#### *Responsibilities and reporting procedure*

It is the contractual duty and responsibility of all employees and associated persons to take whatever reasonable steps are necessary to ensure compliance with this Policy and to prevent, detect and report any suspected bribery or corruption promptly to a Director of one of acl's constituent companies. You must immediately disclose to us any knowledge or suspicion you may have that you, or any other employee or associated person, has plans to offer, promise or give a bribe or to request, agree to receive or accept a bribe in connection with our business. For the avoidance of doubt, this includes reporting your own wrongdoing. The duty to prevent, detect and report any incident of bribery and any potential risks rests not only with the directors of our constituent companies but equally to all employees and associated persons.

We encourage all employees and associated persons to be vigilant and to report any unlawful conduct, suspicions or concerns promptly and without undue delay so that investigation may proceed and any action can be taken expeditiously. In the event that you wish to report an instance or suspected instance of bribery, you should immediately contact a Director of one of our constituent companies. Confidentiality will be maintained during the investigation to the extent that this is practical and appropriate in the circumstances. We are committed to taking appropriate action against bribery and corruption. This could include either reporting the matter to an appropriate external government department, regulatory agency or the police and/or taking internal disciplinary action against relevant employees and/or terminating contracts with associated persons.

We will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. We are also committed to ensuring nobody suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or corruption offence has taken place or may take place in the future.

*Record keeping*

All accounts, receipts, invoices and other documents and records relating to dealings with third parties must be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off the record" to facilitate or conceal improper payments.

*Sanctions for breach*

A breach of any of the provisions of this Policy will constitute a disciplinary offence. Depending on the gravity of the offence, it may be treated as gross misconduct and could render the employee liable to summary dismissal.

As far as associated persons are concerned, a breach of this Policy could lead to the suspension or termination of any relevant contract, sub-contract or other agreement.

*Monitoring compliance*

All Directors of acl constituent companies have responsibility for ensuring compliance with this Policy and will review its contents on a regular basis.

*acl consulting*  
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