

## Audley Group Anti-Bribery Statement

### Policy

1. The Company is committed to applying the highest standards of ethical conduct and integrity to its business activities in the UK and overseas. When acting on behalf of the Company you are responsible for maintaining the Company's reputation and for conducting business honestly and professionally.
2. The integrity and reputation of the Company depends on the honesty, fairness and integrity brought by all associated with the Company.
3. The Company will not tolerate any form of bribery, whether direct or indirect, by, or of, its team members, officers, agents or consultants or any persons or companies acting for it or on its behalf.
4. The Directors and senior management are committed to implementing and enforcing effective systems throughout the Company to prevent, monitor and eliminate bribery, in accordance with its obligations under the Bribery Act 2010.
5. The Company's Anti-Bribery procedures apply to all team members, as well as agency workers, consultants and contractors both in the UK and overseas.
6. All team members and any other individuals acting on behalf of the Company are required to familiarise themselves with and comply with the Company's Anti-Bribery Procedures
7. A bribe is defined as a financial advantage or other reward that is offered to, promised to, given to, or received by an individual or company to induce or influence that individual or company to perform its public or corporate functions or duties in an improper manner (i.e. not in good faith, not impartially, or not in accordance with a position of trust).
8. All team members and any other person acting on behalf of the Company are prohibited from offering, giving, soliciting or accepting any bribe, whether cash or other form of inducement to or from any person or company in order to gain any commercial, contractual or regulatory advantage for the Company in a way which is unethical or in order to gain any personal advantage, monetary or otherwise, for themselves or anyone connected with them.
9. The Company will continue to provide bona fide hospitality to clients and incur promotional expenditure. However, all such expenditure must be transparent, proportionate, reasonable and authorised in advance, in accordance with the Company's anti-bribery procedures.
10. Gifts from Service Users or their relatives (other than small items such as a box of chocolates) should wherever possible be politely refused. See also the Company's Gifts and Gratuities Policy.
11. Inevitably, decisions as to what is acceptable may not always be easy. If anyone is in doubt as to whether a potential act constitutes bribery, the matter should be referred to HR before proceeding.
12. Any breach of the Company's Anti-Bribery procedures will normally be treated as Gross Misconduct.

13. Team members should also note that bribery is a criminal offence.
14. The Company will not conduct business with third parties including clients, suppliers, agents or representatives who are not prepared to support its anti-bribery objectives.
15. The Company depends on all team members, and those acting for the organisation, to assist in the prevention of bribery. Therefore, all team members and others acting for, or on behalf of, the Company are expected to report any suspected bribery to the Company following the Company's Anti-Bribery procedures.
16. All team members will receive the support of the Company if they report of suspected bribery in good faith even if, following an investigation, it is found that no bribery took place.
17. A person found guilty of an offence under the Act can face a prison sentence of up to 10 years and/or an unlimited fine.
18. The Act defines a bribe as "a financial or other advantage". This is a broad definition and covers entertainment and hospitality as well as gifts and other favours.
19. Any alleged breach of this policy will be fully investigated and may result in a disciplinary sanction, up to and including gross misconduct.
20. Any team member or representative who believes a breach of this Policy has taken or is about to take place should report it to their functional Director so that the appropriate steps may be taken. (See Whistleblowing Policy).

### **3. Review**

This statement will be reviewed on a bi-annual basis

### **4. Referencing Other Policies**

Other Audley policies which should be referred to in conjunction with this policy are noted below:

### **5. References**

Whistleblowing Policy  
Gifts and Gratuities Policy  
Disciplinary Policy