

## Anti-Bribery Policy

## **Introduction to nagels Anti-Bribery Policy:**

We are committed to carrying out business fairly, honestly and openly. This means we have a zero tolerance towards bribery. We will never permit or authorise the offering, making or receiving of a bribe.

There are no exceptions to this policy.

This document sets out our general policy in relation to bribery which you all need to be aware of.

## **Our Commitment Starts at The Top**

Our **Managing Director, Lee Minter** and the rest of the Directors/Share Holders are personally committed to this policy. The **Managing Director** is always available to discuss your concerns about our policy. The **Managing Director** will regularly review this policy and its implementation annually on or around 6 April each year.

### **Who does this policy apply to?**

This policy applies to everyone who works for us at whatever level. It will include all Directors, managers, employees (whether permanent or on fixed term contracts, full time or part-time etc), as well as anyone who is not an employee (such as consultants, sub-contractors, agents, representatives).

### **Consequences of breaches of the policy for our employees and Directors**

Bribery is a crime. All of you, whether you are employees or Directors, if you offer, make or receive a bribe you will be breaking the law. We can also be liable for your activities. Bribery carries a sentence of up to 10 years in jail and the possibility of an unlimited fine.

Any employee of ours who offers, makes or receive a bribe is very likely to be subject to disciplinary procedures (and this is likely to amount to gross misconduct and lead to dismissal in many cases).

### **Business consequences for us where bribery takes place**

If we are involved in bribery (or those who work for us or with us or on our behalf, such as our clients, suppliers, agents or workers there can be serious consequences.

For example:

- we will suffer damage to our reputation (including being subject to unfavourable press, TV and social media scrutiny)
- those who do business with us may cancel or not renew contracts with us
- those who buy our goods and services may no longer do so

- if we are convicted of bribery, we may have to pay over whatever amounts we have received from any business or contracts entered into pursuant to a bribe
- we could be stopped from trying to obtain work with some type of contracts with public organisations
- we could be stopped from trying to obtain work from certain international bodies.

### **Consequences for those who provide goods and services to us**

If a Company or a person who provides goods and/or services to us and has used bribery to do so we will normally wish to stop trading with them. For our agents and others acting on our behalf if they breach this policy, let alone offer, make or receive a bribe, we will wish to terminate our contracts immediately with them.

### **How we communicate this policy**

This policy is made available in the following ways:

- A copy of this policy is provided to every new employee, consultant, sub-contractor or anyone who works for or with us or on behalf of us;
- Those working with us (employees and non-employees) who are most likely to be affected by bribery will receive detailed training on practical aspects of the policy including on how to recognise and deal with bribery; and
- Every new person or organisation we enter into a contract to provide our goods and services will receive a copy of this policy.

### **What you should do if you are subject to an offer of or making of a bribe or a request for a bribe?**

If you are asked to make a bribe or you are offered a bribe (whether a mere offer or the actual making of it), you must of course refuse to make or receive the bribe. In normal circumstances:

- you should explain our policy regarding bribery; and you should refuse to make or receive (as the case may be) a bribe; and
- report the matter immediately to **Lee Minter**.

We recognise that in certain circumstances you may feel that your personal safety is at risk if you are asked to make or receive a bribe. It may not be safe for you to explain our policy or to refuse or make the bribe. In such cases our first concern is for your safety. In such circumstances you will need to do what is necessary to protect yourself and then you will need to report what has occurred as soon as possible to **Lee Minter**.

### **Recognising what is and what is not a bribe**

Sometimes it is not always easy to recognise a bribe from a legitimate payment we need make or which we receive.

Hospitality, gifts and charitable donations are not normally illegal and are all perfectly acceptable. They are also a normal way of establishing and building contacts and relationships with potential and actual customers as well as our suppliers.

To help you understand what is acceptable for you to receive or make in the way of gifts and hospitality, please consult **Lee Minter**. Any charitable gift whether made by a third party or to be made by us needs the approval of **Lee Minter**.

Requests to make or receive payments other than that which relates to the normal course of our business must always be treated with suspicion. Consult **Lee Minter** of any situations or offers of payments etc which have caused you or raise any suspicion.

Usually, it will not be difficult to tell when something does not seem right. Usually it is very obvious, because what is occurring or what you are being asked to do is something which does not normally occur in your work for us.

## Raising concerns

We wish to encourage you to raise any concerns or suspicions you may have as soon as you have them. Even if you are not sure whether:

- what has occurred; or
- a payment; or
- the actions of another employee; or
- an action of someone who provides goods or services to us amounts to bribery.

We urge you to raise your concerns with Lee Minter. The **Directors** wish to encourage the reporting of your concerns and suspicions and will wish it be known that if you do so you will not be subject to any disciplinary action or unfavourable treatment (or any threats relating to these). If you consider that you have been subject to such action or treatment, please use our grievance procedure.

## Gifts & Entertaining Explained

This policy covers the receipt of gifts and entertainment. It is intended to protect both Nagels (UK) Limited and individuals and provides guidance on accepting such offers.

As a general principle, no gifts or entertainment should be accepted if they could influence a business decision, be considered extravagant or are unduly frequent. They should be of nominal value and reasonable in the circumstances.

Nagels (UK) Limited is committed to fairness in all business dealings, where a gift or hospitality received or offered could be considered a bribe, this must be reported immediately to a Director. Nagels (UK) Limited would encourage any employees who suspect that bribery is taking place to use the whistle-blowing policy.

To assist everyone in assessing whether offers of gifts and entertainment are appropriate, asking the following questions may be useful:

- Would you be prepared for details of the gift/entertainment offered to be made public, to colleagues, friends, family or the media?

- Would the acceptance create an obligation on you?
- What is the business benefit to Nagels (UK) Limited?
- What is the estimated value to you, and cost to the donor?

Individual discretion should be exercised but where the cost exceeds £25 for a gift or £100 for entertainment, or where travel or overnight accommodation is offered, or the hospitality is extended to spouses or Directors then Directors approval must be obtained prior to accepting.

A Director's approval must be obtained in exceptional circumstances where it is considered necessary to accept a gift of excessive value, and this approval will include advice on an appropriate course of action, such as a donation to charity.

#### **Contacts**

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