

# ANTI-BRIBERY AND CORRUPTION POLICY

We strive to carry out our business activities in an ethical manner with honesty, transparency and without the use of corrupt practices to gain an unfair business advantage; taking our responsibilities under the Bribery Act 2010 extremely seriously.

It is our policy to comply with the laws, rules and regulations governing anti-bribery and corruption law.

Members of our Board have a zero tolerance approach to acts of bribery and corruption. Any breach of this policy will be regarded as a serious matter which may result in disciplinary action.

This policy applies to all individuals working at all levels including directors, employees (whether permanent, fixed term or temporary) contractors, consultants, agency staff, casual workers or any other person acting on our behalf.

There are many definitions of bribery and corruption, for the purposes of this policy:

- Bribery is an inducement or reward offered, promised, provided or received in order to gain contractual, commercial, regulatory or personal advantage.
- Corruption is the misuse of position, power or authority for private gain.

The Members of the Board have identified that the risks to the business fall within the giving / receiving of gifts and corporate hospitality. In this respect they have set out the following guidelines:

## **Corporate Hospitality**

Entertainment of or receipt from third parties may only be undertaken with the express permission of the Managing Director. Full details of the nature of the entertainment must be provided by email to the Managing Director prior to the event taking place so that it may be reviewed for appropriateness in terms of value, occurrence and nature.

The following actions are not acceptable:

- To offer, promise or provide hospitality with the expectation that a business, contractual or commercial advantage will be received or to reward a business advantage already given
- To accept hospitality from a third party if you know or suspect it is being offered with an expectation that a business, contractual or commercial advantage will be provided by ISSL
- To solicit or try to solicit hospitality from a third party
- To offer or receive hospitality that involves entertainment of a sexual or other inappropriate nature

## **Giving / Receiving of Gifts**

The giving or receiving of gifts is acceptable if they are of an appropriate type and value and given in appropriate circumstances (for example small gifts at Christmas).

No gifts should be given to third parties without the express permission of the Managing Director. Any gifts given should always be given openly, not secretly and in the name of ISSL and not an individual.

The offer of or receipt of all gifts should be notified to the Managing Director.

The giving of charitable donations or offers of sponsorship may not be undertaken without the express permission of the Managing Director.

The exchange of gifts in the following circumstances is not acceptable:

- A gift is given with the expectation that a business, contractual or commercial advantage will be received in return or to reward a business advantage already given
- A gift is received if you know or suspect that it is being offered with an expectation that a business, contractual or commercial advantage will be provided by ISSL
- No gifts of cash or a cash equivalent (such as gift certificates or vouchers) may be given or received
- If the gift is unlawful

## **Individual Responsibility**

It is the responsibility of all individuals to whom this policy applies to:

- Read, understand and comply with it at all times
- Avoid any activity that might lead to or suggest a breach of this policy
- To seek guidance from the Managing Director if you are unsure whether a particular act constitutes bribery or corruption
- To report immediately to the Managing Director if you are offered a bribe by a third party or are asked to make one
- To report immediately to the Managing Director if you become aware of any activity or conduct which has taken place or which may take place in the future which you suspect is an action of bribery or corruption

## **Record Keeping**

ISSL will maintain accurate books, records and financial reporting for all areas of its business.

Individuals are required to complete expense forms relating to hospitality or gifts or expenses incurred to third parties and submit them in line with the ISSL expenses procedure

### **Communication, Monitoring and Review**

The Directors of ISSL will ensure that this policy is communicated to all individuals to whom the policy applies.

The policy will be reviewed at least annually for effectiveness.



**Gary Beeston**  
**Managing Director**