

## Anti-Bribery Policy & Procedure

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## Anti-Bribery Policy & Procedure

### Policy Aim

The aim of this policy is:

- To establish controls to ensure compliance with all applicable anti-bribery and corruption regulations, and to ensure that the Company's business is conducted in a socially responsible manner
- To ensure that all staff always act honestly and with integrity and safeguard both the MERCURI INTERNATIONAL (UK) LTD's Apprentices, Learners and the organisation's resources.
- To ensure that all members of staff can be confident that they will not suffer in any way as a result of reporting reasonably held suspicions of bribery.
- To effectively minimise the possibility of bribery and corruption occurring within MERCURI INTERNATIONAL (UK) LTD.

### Organisational Statement

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal or a breach of trust. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. It is our policy to conduct all our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption.

MERCURI INTERNATIONAL (UK) LTD is committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.

MERCURI INTERNATIONAL (UK) LTD acknowledges that we are bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both at home and abroad. Bribery and corruption are punishable for individuals by up to ten years' imprisonment and a fine. If we (anyone representing MERCURI INTERNATIONAL (UK) LTD) are found to have taken part in corruption, we could face an unlimited fine, be excluded from tendering for public contracts, lose our RoATP membership and ATO status with APS and face damage to our reputation. We therefore take our legal responsibilities very seriously.

### Scope

This policy applies to all individuals working in all positions including Directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, homeworkers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us wherever located (collectively referred to as employees in this policy).

This policy covers:

- Bribes;
- Gifts and Legacies

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- Facilitation payments;
- Political contributions;

All employees should be aware of and follow this policy. Breaches of this policy will be treated as gross misconduct and will be subject to disciplinary action leading to summary dismissal

### Responsibilities

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

The Apprenticeship Manager has primary and day-to-day responsibility for implementing this policy, and for monitoring its use and effectiveness and dealing with any queries on its interpretation. Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy.

All employees must ensure that they read, understand and comply with this policy.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control.

All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy. Employees must notify their manager as soon as possible if they believe or suspect that a conflict with or breach of this policy has occurred or may occur in the future.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with other workers if they breach this policy.

### Procedures

#### Gifts

Employees must not offer or give any gift or hospitality which could be regarded as illegal or improper, or which violates the recipient's policies; or to any public employee or government officials or representatives, or politicians or political parties.

At MERCURI INTERNATIONAL (UK) LTD there is no concern about a member of staff receiving the occasional gift from an Employer, Apprentice or Learner such as flowers, a card, chocolates etc. People like to give and we should be pleased to receive small tokens of gratitude as a result of the service delivered.

However, you must notify your Manager of any gift you are given, no matter how small it may seem. Your Manager will keep a written record of this to prevent the risk of impropriety or even the perception of it. Where there is concern, the Manager will take the issue up with the staff member and act appropriately.

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Receiving regular gifts or any gift beyond a small and inexpensive token of gratitude is a different matter altogether and it is unacceptable for a member of staff to take such gifts. You must notify your Manager about what has been offered, by whom, when and the circumstances who will then act appropriately.

If you do not declare a small gift received or the offer of a gift, this could be taken as gross misconduct for which a member of staff could be disciplined and subsequently dismissed. The issues surrounding the gifts and legacies can potentially cause the member of staff and MERCURI INTERNATIONAL (UK) LTD serious difficulties and this needs to be avoided due to both the potential legal implications of such a situation and to ensure the good reputation of MERCURI INTERNATIONAL (UK) LTD is not placed at risk.

A member of staff is not to encourage anyone in our care to offer them a gift of any type, this would be dealt with as a disciplinary matter.

### Bribes

Employees must not engage in any form of bribery, either directly or through any third party such as an Apprentice, Learner, agent or distributor.

Any attempt from a Learner or Apprentice to bribe either a member of staff or another Learner/Apprentice to complete work on their behalf must be reported immediately.

### Facilitation Payments

Facilitation payments are a form of bribery made for the purpose of expediting or facilitating the performance of a public official for a routine governmental action, and not to obtain or retain business or any improper business advantage. Facilitation payments tend to be demanded by low level officials to obtain a level of service which one would normally be entitled to.

Our strict policy is that facilitation payments must not be paid. In order to achieve our aim of not making any facilitation payments, MERCURI INTERNATIONAL (UK) LTD will keep a record of all such requests for payments to be made, which will be reviewed annually in order to evaluate the business risk

### Political Contributions

MERCURI INTERNATIONAL (UK) LTD does not make donations, whether in cash or kind, in support of any political parties or candidates, as this can be perceived as an attempt to gain an improper business advantage.

### Charitable contributions

Charitable support and donations are acceptable (and indeed are encouraged), whether of in-kind, services, knowledge, time, or direct financial contributions. However, employees must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery. We only make charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made without the prior approval of the Managing Director.

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All charitable contributions will be disclosed.

### Record-keeping

MERCURI INTERNATIONAL (UK) LTD must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

Employees must declare and keep a written record of all hospitality or gifts accepted or offered, which will be subject to managerial review.

Employees must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with our 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. No accounts must be kept "off-book" to facilitate or conceal improper payments.

### Raising Concerns

Employees are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries or concerns, these should be raised with your line manager.

### What to do if you are a victim of bribery or corruption

It is important that you tell your line manager as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

### Protection

Employees who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. MERCURI INTERNATIONAL (UK) LTD aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

MERCURI INTERNATIONAL (UK) LTD is committed to ensuring no one 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 other corruption offence has taken place or may take place in the future.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your line manager immediately. If the matter is not remedied, you should raise it formally using the company's Grievance Procedure.

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### Communication

Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

### Monitoring and review

The Managing Director will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

All employees are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

Employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Managing Director.

This policy does not form part of any employee's contract of employment and it may be amended at any time.

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### Version Information

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<b>Policy version number</b>	MERUK-108		
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