



## Anti-Bribery, Anti-Corruption and Ethics Policy

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### STATEMENT OF GENERAL POLICY

#### POLICY AIMS AND SCOPE

TB Davies (Cardiff) Limited is committed to ensuring that all of our business is conducted in an honest and ethical manner. All TB Davies employees are responsible for taking anti-bribery actions, employees are also to take an active role in matters of ethics and in preventing or reporting bribery and corruption.

Our commitment:

- To remain fundamentally opposed to any acts of bribery and to the making of facilitation payments as defined by The Bribery Act 2010
- That employees and any other interested parties associated with TB Davies such as agents, contractors and business partners are not permitted to either offer or receive any type of bribe and/or facilitation payment
- That all employees are consistently encouraged to report any suspicion of corruption or bribery within the Company in accordance with the reporting procedure to a Director
- That if a situation arises whereby any employee or interested party is in doubt when receiving or issuing gifts and hospitality, that he/she must refer to a Director
- That TB Davies will use its reasonable endeavours to implement the guidance principles on bribery management that are published, from time to time, by Secretary of State in accordance with Section 9 of the Bribery Act 2010
- That if an employee or interested party is found guilty of giving or receiving a bribe, he/she will be personally criminally liable and may also be subject to disciplinary action
- That anyone found guilty of bribery, will be responsible for bearing any related remedial costs such as losses, court fees or expenses

Mat Gray  
Director

David Gray  
Managing Director

Issue Date: October, 19th, 2017  
Review Date: October 19th, 2018

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## RESPONSIBILITIES

Overall and final responsibility for anti-bribery, anti-corruption and ethics is that of:

**Mat Gray,**  
**Company Director**

All employees will have responsibility for ensuring this policy is put into practice and that action is taken to monitor that everyone is complying with the policy. They will ensure any breaches are reported and support any necessary actions or sanctions as a result. Additionally, they will ensure that they keep up to date with the current developments and changes in legislation. Training to raise awareness and understanding of changing requirements will be provided where necessary.

Breaches of the policy by employees will not be acceptable and will be dealt with under the disciplinary procedures. In serious cases, this could lead to dismissal of the individual(s) concerned. Any non-employee who breaches this policy may have their contract terminated with immediate effect.

This policy however, applies to all employees and any interested party acting on our behalf. This includes employees at all levels, directors, agency workers, volunteers, contractors, and third party consultants or representatives.

## BRIBERY AND CORRUPTION

A bribe is defined as a financial or other inducement or reward for action which is illegal, unethical, a breach of trust, or deemed improper by Directors. Bribes may be made in the form of money, gifts, loans, fees, hospitality, services, discounts, award of contract, website cashback schemes or other advantageous benefits. Bribery includes offering, promising, giving, accepting or seeking a bribe, all forms of bribery are prohibited, without exception.

All employees must:

- Never offer any form of bribe in the expectation that an advantage will be received in return, or to reward any received business;
- Never accept any offer from a third party that is known or suspected to have been made with an expectation of business advantage in return;
- Never give or offer any payment or bribe (facilitation payment) to a government official to facilitate or speed up a routine or necessary procedure;
- Never retaliate against or threaten a colleague or associated person who has raised concerns about possible bribery or corruption;
- Freely disclose and consistently record any gifts or hospitality which has been provided to them by a third party, in the interest of ethical practice and transparency;
- Report any suspected actions of bribery in respect of a colleague or third party representative to a Director with immediate effect.

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## ETHICALLY ACCEPTABLE PRACTICE

It is understood that accepting of gifts and hospitality for legitimate purposes is a key contributor to building relationships, maintaining our reputation and marketing products or services, where reasonable. Employees should refer to a Director for guidance on whether a gift or suggested hospitality is considered reasonable. No offer of gifts or hospitality is acceptable during contractual negotiations or a tender process, or any other process where the third party expects preferential treatment as a result. Gifts must be of an appropriate value dependant on the circumstances and reason for its provision. Gifts of cash or vouchers must never be accepted, and must never be given or accepted in secret. Gifts must always be given in the company name and never attributed to an individual.

All employees must openly declare any hospitality or gifts received, and should maintain a record of these. Expenses claims relating to hospitality, gifts or payments to third parties must be made in a timely and transparent manner, recording the reason for expenditure. All accounts, invoices and any other records relating to third parties should be fully accurate. No documents or expenses are to be considered “off-book” to conceal any improper, or suspected improper, practice.

## RAISING CONCERNS AND REPORTING INETHICAL PRACTICE

Employees or interested parties who:

- a) are offered a bribe;
- b) asked to make one; OR
- c) suspect bribery, corruption or other breach of this policy

must notify a Director with immediate effect. Failure to do so is considered a breach of this policy.

### DECLARATION

I / we understand that acceptance of this policy will be used to assess my / our organisation’s suitability to become a prospective supplier of TB Davies (Cardiff) Limited and that information will be held on computer and manually for this purpose in accordance with the Data Protection Act. I / we commit to informing TB Davies of any breaches of this policy as quickly as possible.

Name:	Position:
Business Name:	Address:
Signature:	Date: