



**SOP412**  
**Anti-Bribery and Corruption Procedure**

	<b>NAME</b>	<b>POSITION</b>
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## 1 Purpose & Scope

This policy has been produced under our commitment to full compliance with the Bribery Act 2010. This is a significant piece of Legislation that covers four bribery offences: making a bribe; accepting a bribe; bribing a foreign public official; and failing to prevent bribery. Breach of the Act carries potentially severe criminal penalties for individuals and for businesses. This policy does not therefore only form part of employees Terms and Conditions of Employment, with any breach being subject to Serious (Gross) Misconduct procedures, but any breach may also require to be reported to the Authorities who may take further action against the individual and / or the Company. The policy needs to be adhered to by every individual within Optimum Technical Services (OTS).

## 2 Responsibilities & Authorities

- The Director holds responsibility within this procedure to ensure it is followed by all staff.
- Employees at all levels in the business are required to comply with the requirements of this procedure.
- Only the Director and Quality Systems Manager have responsibility to amend this procedure.

## 3 Regulations & Standards

Bribery Act 2010  
Achilles Cat 'B2'

## 4 General Policy Statement

This Anti-Bribery and Corruption Policy and Procedure forms part of our Ethics Policy and Code of Conduct and represents a commitment to transparency and zero tolerance of Bribery in pursuit of our business objectives. We will carry out our activities fairly, honestly and openly with all our Suppliers, Customers, Sales Agents and other Third Party Organisations. OTS will not work with any organisation where there is evidence of any bribery being committed or proposed.

### Definition of bribery:

- The receiving/offering/giving/providing/requesting/accepting of a financial or other advantage, in order to seek to induce a person or to induce a person to give improper assistance in breach of their duty, or to otherwise influence someone with the underlying purpose of obtaining/retaining business, or an advantage in the course of business.
- The misuse of entrusted power/breach of duty for personal gain.

## 5 Procedures

The following procedures must be followed in our dealings with any external parties:

### 5.1 Dealing with Suppliers or Service Providers

It is imperative when dealing with suppliers or external service providers that no-one accepts or tolerates the suggestion or promise of a bribe. Any external individual suggesting or attempting to make a bribe to any OTS employee must be reported immediately to your line manager or other senior manager within OTS or Turner Property Services.

### 5.2 Dealing with Clients and Customers

It is forbidden to solicit for money or make any suggestion or promise of a bribe to any Client or Customer. Any employee suggesting or requesting that a bribe (money or otherwise) be made to them must be reported immediately to your line manager or other senior manager within OTS or Turner Property Services.

### 5.3 Dealing with Third Parties (Suppliers/Sub-Contractors)

The Bribery Act 2010 makes a company liable where someone who performs services on its behalf makes or promises to make a bribe to gain a business advantage for the company. In order to minimise the risk of a third party causing OTS to fall foul of the Act, we must ensure that all reasonable due diligence is performed before engaging or re-engaging with third parties. Supplier/Sub-Contractor Approval Forms must be completed in order to approve any third party.

### 5.4 Corporate Hospitality and Promotional Activities

The Act does not cover or intend to penalise genuine hospitality or similar business expenditure that is reasonable and proportionate given the sort of business a Company is engaged in. Acceptance of hospitality at relevant conferences, courses or events may be appropriate where it is clear that the hospitality is corporate rather than personal and where the Company has given its consent in advance. See Business Gifts and Hospitality Policy (SOP111) for further information.

## 6 Our Policy


We will take appropriate steps to ensure that:

- 6.1 We do not, directly or indirectly offer, promise, give, accept or demand a bribe or other undue advantage (including excessive gifts and hospitality) in order to obtain or retain business, or gain any other improper advantage.
- 6.2 We do not offer, nor give in to demands, to make illicit or illegal payments to agents, public officials (at whatever level), or the employees of business partners or anybody else that we do business with.
- 6.3 We engage and remunerate agents and other third parties only for legitimate services and adopt appropriate transparency in our approach.
- 6.4 We promote employee awareness of, and compliance with, company policies against bribery and corruption through appropriate dissemination of our own procedures (including disciplinary procedures) policies and training programmes on induction and subsequently.
- 6.5 We adopt management control systems that discourage bribery and corruption, and adopt financial and tax accounting and auditing practices that prevent the establishment of "off the books" secret accounts or the creation of documents which do not properly and fairly record the transactions to which they relate.

- 6.5.1 We do not make illegal or inappropriate contributions to candidates for public office or to political parties or to other political organisations.
- 6.5.2 We raise awareness of the need to combat bribery and corruption with our business partners by publication of this Policy and (where appropriate) relevant contractual provisions and support initiatives designed to reduce the risk of bribery and corruption.

Colin Russell  
Director  
Optimum Technical Services Ltd  
August 2019

Signed:



## 7 Training Requirements

All personnel are required to be made aware of this policy and shall be issued access via the company document management system.

## 8 Related Documents

Other documents within the Optimum management system which are relevant to this procedure are listed below.

Document Name	Document Number
Ethics Policy and Code of Conduct	SOP410
Business Gifts and Hospitality Policy	SOP113

