



# Anti Bribery and Corruption Policy

## Statement of Commitment

The Gelder Group's ambition and aim is to be 'The Best' at what it does. To achieve this vision we have to build, maintain, protect and enhance our reputation among our stakeholder, including employees, customers, supply chain partners, as well as among the community at large. A good reputation is a difficult thing to achieve and a valued asset to our company, one we must protect. Our ability to tender for new business and our relationships with stakeholders depends a great deal upon the good reputation that we have established through 23 years of business. Your personal contribution to protecting and enhancing our reputation by complying with this policy is invaluable in securing new business and being a profitable company.

This policy is designed to help you understand the legislation relevant to 'The Bribery Act 2010'.

Myself and the board are fully committed to this policy and would ask you to show your commitment too, by reading and adhering to it.

A handwritten signature in blue ink, appearing to read "Steve Gelder".

Steve Gelder MBE  
Managing Director



## Introduction

On the 1<sup>st</sup> July 2011 'The Bribery Act 2010' came into effect. Under this Act it is an offence for a commercial organisation to fail to prevent an incident of bribery committed either by the company or by someone associated with it in order to obtain or retain a business advantage. This anti-bribery and corruption policy applies to employees of the Gelder Group. The Gelder Group will only do business with those who accept the terms of our policy or whose own policy sets standards to match our own; in the case of sub contracts and consultants.

## What is Bribery?

Bribery and corruption can occur in many forms; so understanding them and recognising when they might occur is a key step in guarding against them. Bribery is when a person offers, promises or gives a financial (or other) advantage to another person with the intention of inducing or rewarding that person to act improperly. In our industry, bribery could occur in situations such as tendering, appointing preferred suppliers, contractors and agents, awarding Safe Partners and so on.

Bribes are not always a matter of handing over cash. Gifts, hospitality and entertainment can be bribes if they are intended to influence a business decision. Transparency and openness are effective weapons against bribery, so be ready to challenge any arrangements that compromise them. Even political contributions, charitable donations and sponsorship arrangements can be used as a subterfuge for bribery.

## What is the Penalty?

Individuals and/or companies can face fines of up to £5,000 and imprisonment of up to 10 years. In addition, you will be disciplined as per company policy, up to and including dismissal. We take this responsibility very seriously and this is why we want to be associated only with others whose standards match our own. A conviction for a bribery or corruption related offence would have severe penalties for our reputation. A damaged reputation could lead to us being excluded from tender lists or being overlooked when bidding; loss of business which could have severe financial consequences for our business.

## What forms of Bribery are there?

Bribery can be a risk in many areas of our industry. These are a few key areas you can monitor:

- **Facilitation payments**  
*Facilitation payments are usually small payments (or gifts) made to public officials in order to speed up or 'facilitate' actions the officials are already duty-bound to perform.*



*Our policy prohibits any such payments and we make no distinction between facilitation payments and bribes, regardless of their size or the local culture*

- **Kickbacks and reciprocal agreements**  
*Kickbacks and reciprocal agreements or any other form of 'quid pro quo' are never acceptable.*
- **False claims**  
*Accepting payment, gifts or hospitality in return for an inflated, exaggerated or fraudulent claim is not tolerated.*
- **Corrupt third parties (including agents, consultants, contractors or subcontractors)**  
*Corrupt third parties can include a range of people acting on our behalf such as agents, consultants, contractors or sub-contractors. We will only work with those who are committed to our standards and will undertake due diligence to ensure this. We will engage a third party only when there is a clear business rationale for doing so and with an appropriate contract. We will ensure all payments made to third parties are properly authorised and recorded.*
- **Excessive gifts and hospitality**  
*Excessive gifts and hospitality can be used to exert improper influence on decision makers. We will only accept gifts and hospitality in accordance with our policy. We will ensure any gifts or hospitality we offer are reasonable in terms of value and frequency. We will never offer or accept gifts or hospitality if we feel it could influence a business decision or give the appearance of doing so.*
- **Inadequate financial controls or record keeping.**  
*Inadequate financial controls or record keeping can be exploited to hide bribes or corrupt practices. We will ensure we have robust controls in place so that our financial and other records are accurate and complete and never misleading.*

The only exception is where a payment is extorted from you. If you feel coerced or that your safety (or that of your family or colleagues) is at risk, then you should make the payment but report it immediately to your line manager and Finance Director.

## How do I stop it happening?

Our 'no tolerance' of bribery relies on each one of us choosing to do the right thing. All this takes is a few simple commitments:

As a Gelder Group Employee **you agree to:**

- ✓ Comply with this Anti-Bribery and Corruption Policy.
- ✓ Act according to the Gelder Group Standards.



- ✓ Comply with company policies on gifts and hospitality; political contributions and charitable donations
- ✓ Comply with our requirements concerning any conflicts of interest.
- ✓ Record all activities and transactions accurately, completely and transparently.
- ✓ Follow appropriate due diligence and risk mitigation procedures before proceeding with any contract or other arrangement.
- ✓ Seek advice if unsure how to proceed.
- ✓ Report any suspected or actual breaches of this policy promptly and accurately to your line manager or the Finance Director.

As a Gelder Group Employee **you will not:**

- ✗ Participate in any form of bribery.
- ✗ Use company funds, in the form of payments or gifts and hospitality for any unlawful, unethical or improper purpose.
- ✗ Authorise, make, tolerate or encourage, or invite or accept, any improper payments to obtain, retain or improve business.
- ✗ Permit anyone to offer or pay bribes or make facilitation payments on our behalf, or do anything else we would not be permitted to do ourselves.
- ✗ Offer or give anything of value to a public official (or their representative) to induce or reward them for acting improperly in the course of their public responsibilities.
- ✗ Offer or accept gifts or hospitality, if it might impair objective judgment, improperly influence a decision or create a sense of obligation, or if there's a risk it could be misconstrued or misinterpreted by others.

## How to I raise a concern?

If you have a concern and suspect a violation of this policy you must contact your Line Manager, the Group Training Manager or the Finance Director immediately. The information received will be treated seriously and investigated as appropriate.

If you act in good faith, believing your information is accurate, we will protect you even if your information results in being incorrect. Doing the right thing will not disadvantage your career or adversely affect your relationships at work.