



BRIBERY POLICY

Introduction

The Participation People aims to ensure all its business affairs are conducted in an ethical and honest manner. The Company has a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all of its business dealings and relationships and implementing and enforcing effective systems to counter bribery.

The Bribery Act 2010 is important to all employees of the Participation People because if an employee is deemed to be guilty of an offence under this legislation, it could lead to summary dismissal for gross misconduct under the Company's disciplinary procedure. If the Company were also found to have acted negligently in respect of trying to prevent bribery in the organisation, then the company and its Directors could be subject to criminal sanctions including unlimited fines and imprisonment.

Policy

This policy aims to increase your awareness of the Company's position on preventing and prohibiting bribery in accordance with the Bribery Act 2010.

This policy applies to all employees of the Participation People as well as agency workers, temporary workers, contractors and any third party with whom you may come into contact with during the course of your work. Third parties may therefore include current and potential clients, customers, suppliers, distributors, advisers, business contacts and government and public bodies.

What is a Bribe?

A bribe is an inducement or reward offered, promised or provided in order to gain a commercial, contractual, regulatory or personal advantage.

The Company prohibits employees or associated persons from offering, promising, giving, soliciting or accepting any bribe.

Receiving Gifts and Corporate Hospitality

The Company recognises that gifts and hospitality can be an important part of developing relationships with business contacts. Gifts are usually given as a mark of appreciation. You must make your line manager aware of any gifts or hospitality offered to you.

Hospitality is a way of building upon existing relationships or creating new ones. It may include entertaining, meals, receptions, tickets to entertainment, social or sports events with the purpose of initiating or developing relationships with business contacts, for example. Please remember that if you accept such forms of hospitality, the host should always be present, otherwise it is a gift. Accepting lavish, extravagant or repeated hospitality could easily be misinterpreted by third parties. Please review the appropriateness of the invitation with your line manager before accepting.

In general, the Company believes that receiving a gift up to the value of £100 or corporate hospitality up to the value of £100 is a proportionate means of achieving our legitimate aim to build and maintain good business relationships. However, your line manager will decide whether it is appropriate to accept the gift or hospitality. If you believe that the gift or hospitality may exceed the limits outlined above, you will need to complete an authorisation form (Appendix 1).

Providing Gifts and Corporate Hospitality

In some cases, it may be acceptable to provide a gift to a customer or business contact. Before doing this, please give consideration as to how this may be perceived by the recipient. For example, you should consider whether there may be any possible suggestion of undue influence upon a customer or business contact before making a gift and also whether the provision or acceptance of the gift may contravene the recipient's own internal policies. There may also be tax implications if the value of the gift is over a certain amount.

The Company will authorise reasonable and proportionate hospitality events which are arranged in good faith as part of our normal client and business relationship development practices. However, if you provide hospitality which is lavish, provided frequently, especially to the same individuals, or leaves the recipient in a position of obligation, this may lead us to question this further with you to determine if you have exceeded the scope of the policy.

Please remember never to:

- Give, accept, offer or promise a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already received.
- Threaten or retaliate against another individual who has refused to commit an offence or who has made an allegation of wrongdoing.
- Engage in any activity that might lead to a breach of this policy.

Providing Gifts/ Corporate Hospitality Process

In order to protect yourself and the Company from allegations of bribery you must complete an authorisation form (Appendix 2) for any gift totalling more than £100 or hospitality totalling more than £100. This form must be authorised by the line manager prior to any gift being purchased or hospitality arranged.

Reporting Allegations of Bribery

The Participation People are committed to acting in a professional manner and promoting an anti-corruption culture within all areas of the business. Should you believe that a fellow employee is giving or receiving bribes then you must notify the line manager, as soon as

possible so that these allegations can be investigated further. All allegations of bribery will be investigated thoroughly. This may lead to disciplinary action, up to summary dismissal for serious cases deemed to be gross misconduct. All employees, where appropriate, will be required to co-operate in any investigation into possible or suspected bribery.

If you are asked by a client or supplier for gifts, hospitality or anything else which you believe would constitute a bribe under the policy definition then you must report the incident to your line manager immediately. Your allegations will then be investigated further and action taken as appropriate.

Policy Responsibilities

The CEO has overall responsibility for ensuring this policy complies with all requirements of the Bribery Act 2010.

All managers will be responsible for ensuring that their employees are adhering to this policy and will monitor and review all hospitality bills and gift or hospitality offers from suppliers to ensure compliance.

Managers should report all gifts and hospitality offered and accepted by themselves or employees to your line manager who will keep accurate, detailed and up to date records, including those not requiring to be authorised.

RECEIVING A GIFT / HOSPITALITY AUTHORISATION FORM

APPENDIX 1

This form is to be used in order to obtain authorisation for any gift in excess of £100 or hospitality expenses in excess of £100 (inclusive of VAT). This form will be kept as evidence of due diligence in accordance with the Bribery Act 2010.

Employee Details

Name:	
Department:	
Date of request:	

Client/Supplier/Business Contact Details

Company name and address:	
Individual's name (if applicable):	
Relationship (e.g. client/supplier):	

Details of Gift / Hospitality

Reason for gift/hospitality:	
Description of gift/hospitality:	
Approximate cost of gift/hospitality (if known):	

Authorised? Yes / No

Name: _____

Date: _____

Job Title: _____

PROVISION OF GIFT / HOSPITALITY AUTHORISATION FORM APPENDIX 2

This form is to be used in order to obtain authorisation for any gift or hospitality in excess of £100 or hospitality expenses in excess of £100 (inclusive of VAT) that you propose to provide to a client, supplier or any other third party. This form will be kept as evidence of due diligence in accordance with the Bribery Act 2010.

Employee Details

Name:	
Department:	
Date of request:	

Client/Supplier/Business Contact Details

Company name and address:	
Recipient's name (if applicable):	
Relationship (e.g. client/supplier):	

Gift Details

Reason for gift/hospitality:	
Description of gift/hospitality to be purchased:	
Cost of gift/hospitality :	

Authorised? Yes / No

Name: _____

Date: _____

Job Title: _____

Provision of Gift / Hospitality Authorisation Form – Appendix 2

Hospitality Details

Reason for hospitality:	
Date of hospitality:	
Type of hospitality (including venue):	
Total cost of hospitality:	
Names of all attendees:	

Authorised? Yes / No

Name: _____

Date: _____

Job Title: _____

For Finance Department use only:

Date expense claim received:		Name:	
Expense claim matches amount requested	Yes / No	Signature:	
If variance please detail:		Date checked:	
Expense form requires escalation	Yes / No		

Date reviewed: 21 January 2021

Date next reviewed: 21 January 2022