



## ANTI-BRIBERY AND CORRUPTION POLICY

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Fox (Owmbly) Limited is proud of its reputation for ethical behaviour and financial integrity and as such recognises that any involvement in bribery will reflect adversely on its' image and reputation. The Company's aim is therefore to limit its exposure to bribery by:

- setting out a clear anti-bribery policy
- the training of all employees so that they can recognise and avoid the use of bribery by themselves and others
- encouragement of employees to be vigilant and to report any suspicion of bribery, and as such providing them with suitable channels of communication as detailed within the Company's **Whistle Blowing Policy** together with ensuring that sensitive information is treated appropriately
- rigorously investigating instances of alleged bribery and assisting the police and other appropriate authorities in any resultant prosecution
- ensuring that firm and vigorous action is taken against any individual(s) involved in bribery
- not allowing any political contributions to be made by the Company

***Bribery is defined as: "the offering, promising, giving, receiving or soliciting of something of value for the purpose of influencing the action of any individual in the discharge of their duties."***

### **THE POLICY**

Fox (Owmbly) Limited prohibits:

The offering, the giving, the solicitation or the acceptance of any bribe whether cash or other *inducement* to or from

Any person or company, wherever they are situated and whether they are a public official or body or private person or company

by

Any individual employee, sub-contractor, agent or any other person or body acting on Fox (Owmbly) Limited's behalf

in order to

Gain any commercial, contractual or regulatory advantage for Fox (Owmbly) Limited in a way which is unethical

or in order to

Gain any personal advantage, financial or otherwise for the individual or anyone connected with the individual.

Fox (Owmbly) Limited reiterates that this policy prohibits any inducement which results in a personal gain or advantage to the recipient or any person or body associated with them and which is intended to influence them to take action which may not be solely in the interests of Fox (Owmbly) Limited or of the person or body employing them or whom they represent.

It is not the intention of this policy to prohibit the following practices providing they are customary within the industry, are proportionate and are properly recorded.

- normal and appropriate hospitality
- the giving of a ceremonial gift
- the use of any recognised fast track process which is available to all on payment of a fee
- the offer of resources to assist the person or body to make the decision more efficiently provided that they are supplied for that purpose only
- donations to charities will only be permitted with written authorization from the Directors

Decisions as to what is acceptable may not always be easy. The ***Gifts and Entertainment Policy*** provides further information on the matter however, if any employee is in doubt as to whether a potential act constitutes bribery the matter must always be referred to the Company Secretary and/or a Director prior to any action being taken.

### **EMPLOYEE RESPONSIBILITY**

The prevention, detection and reporting of bribery is the responsibility of all employees throughout Fox (Owmbly) Limited.

All reported instances of alleged bribery will be dealt with in the strictest confidence and if you prefer, and the law permits, you can report anonymously.

### **DISCIPLINARY ACTION**

Bribery is a criminal offence which may lead to criminal penalties. You have a duty to Fox (Owmbly) Limited and as such breaches of this policy will result in prompt disciplinary action up to and including dismissal.

### **LEGAL OBLIGATIONS**

The UK legislation on which this Policy is based is the Bribery Act 2010 and it applies to the Company's conduct both in the UK and abroad.

It is an offence in the UK to:

- offer, promise or give a financial or other advantage to another person (ie bribe a person), whether within the UK or abroad, with the intention of inducing or rewarding improper conduct
- request, agree to receive or accept a financial or other advantage (ie receive a bribe) for or in relation to improper conduct
- bribe a foreign public official

You can be held personally liable for any such offence.

It is also an offence in the UK for an employee or an associated person to bribe another person in the course of doing business intending either to obtain or retain business, or to obtain or retain an advantage in the conduct of business, for the Company.

The Company can be liable for this offence where it has failed to prevent such bribery by associated persons. As well as an unlimited fine, it could suffer substantial reputational damage.

**STATEMENT OF COMMITMENT**

Fox (Owmbly) Limited will not tolerate any form of bribery or corruption.

This policy demonstrates Fox (Owmbly) Limited's zero-tolerance approach to bribery and corruption. The policy will be regularly reviewed and updated as and when necessary.