



COMPLETE QUALITY DOCUMENT

## Anti-Bribery and Corruption Policy

### What does our policy cover?

1.1 This anti-bribery policy exists to set out the responsibilities of B&B Precision Engineering Huddersfield Ltd and those who work for us in regards to observing and upholding our zero-tolerance position on bribery and corruption.

1.2 It also exists to act as a source of information and guidance for those working for B&B Precision Engineering Huddersfield Ltd. It helps them recognise and deal with bribery and corruption issues, as well as understand their responsibilities.

### Policy statement

2.1 B&B Precision Engineering Huddersfield Ltd is committed to conducting business in an ethical and honest manner, and is committed to implementing and enforcing systems that ensure bribery is prevented. B&B Precision Engineering Huddersfield Ltd has zero-tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships, wherever in the country we operate.

2.2 B&B Precision Engineering Huddersfield Ltd will constantly uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which we operate. We are bound by the laws of the UK, including the Bribery Act 2010, in regards to our conduct both at home and abroad.

2.3 B&B Precision Engineering Huddersfield Ltd recognises that bribery and corruption are punishable by up to ten years of imprisonment and a fine. If our company is discovered to have taken part in corrupt activities, we may be subjected to an unlimited fine, be excluded from tendering for public contracts, and face serious damage to our reputation. It is with this in mind that we commit to preventing bribery and corruption in our business, and take our legal responsibilities seriously.



## Anti-Bribery and Corruption Policy

### Who is covered by the policy?

3.1 This anti-bribery policy applies to all employees (whether temporary, fixed-term, or permanent), consultants, contractors, trainees, seconded staff, home workers, casual workers, or any other person or persons associated with us.

3.2 In the context of this policy, third-party refers to any individual or organisation our company meets and works with. It refers to actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies – this includes their advisors, representatives and officials, politicians, and public parties.

3.3 Any arrangements our company makes with a third party is subject to clear contractual terms, including specific provisions that require the third party to comply with minimum standards and procedures relating to anti-bribery and corruption.

### Definition of bribery

4.1 Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision.

4.2 A bribe refers to any inducement, reward, or object/item of value offered to another individual in order to gain commercial, contractual, regulatory, or personal advantage.

4.3 Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law.

4.4 Bribery is illegal. Employees must not engage in any form of bribery, whether it be directly, passively (as described above), or through a third party (such as an agent or distributor). They must not bribe a foreign public official anywhere in the world. They must not accept bribes in any degree and if they are uncertain about whether something is a bribe or a gift or act of hospitality, they must seek further advice from the company's compliance manager.



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What is and what is NOT acceptable

B&B Precision Engineering Huddersfield Ltd accepts normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts meets the following requirements:

- a.** It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits.
- b.** It is not made with the suggestion that a return favour is expected.
- c.** It is in compliance with local law.
- d.** It is given in the name of the company, not in an individual's name.
- e.** It does not include cash or a cash equivalent ( e.g. a voucher or gift certificate).
- f.** It is appropriate for the circumstances ( e.g. giving small gifts around Christmas or as a small thank you to a company for helping with a large project upon completion).
- g.** It is of an appropriate type and value and given at an appropriate time, taking in to account the reason for the gift.
- h.** It is given/received openly, not secretly.
- i.** It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.
- j.** It is not above a certain excessive value, as pre-determined by the company's compliance manager (usually in excess of £100).
- k.** It is not offer to, or accepted from, a government official or representative or politician or political party, without the prior approval of the company's compliance manager.



## Anti-Bribery and Corruption Policy

### Employee Responsibilities

6.1 As an employee of B&B Precision Engineering Huddersfield Ltd, you must ensure that you read, understand, and comply with the information contained within this policy, and with any training or other anti-bribery and corruption information you are given.

6.2 All employees and those under our control are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this anti-bribery policy.

6.3 If you have reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, you must notify the compliance manager.

6.4 If any employee breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct. B&B Precision Engineering Huddersfield Ltd has the right to terminate a contractual relationship with an employee if they breach this anti-bribery policy.

### What happens if I need to raise a concern?

7.1 This section of the policy covers 3 areas: How to raise a concern, what to do if you are a victim of bribery or corruption, and Protection.

#### 7.2 How to raise a concern

If you suspect that there is an instance of bribery or corrupt activities occurring in relation to B&B Precision Engineering Huddersfield Ltd you are encouraged to raise your concerns at as early a stage as possible. If you're uncertain about whether a certain action or behaviour can be considered bribery or corruption, you should speak to your line manager, the compliance manager, the director, or the Head of Governance and Legal.

7.3 B&B Precision Engineering Huddersfield Ltd will familiarise all employees with its whistle blowing procedures so employees can vocalise their concerns swiftly and confidentially.



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### 7.4 What to do if you are a victim of bribery or corruption

You must tell your compliance manager as soon as possible if you are offered a bribe by anyone, if you are asked to make one, if you suspect that you may be bribed or asked to make a bribe in the near future, or if you have reason to believe that you are a victim of another corrupt activity.

### 7.5 Protection

If you refuse to accept or offer a bribe or you report a concern relating to potential act(s) of bribery or corruption, B&B Precision Engineering Huddersfield Ltd understands that you may feel worried about potential repercussions. B&B Precision Engineering Huddersfield Ltd will support anyone who raises concerns in good faith under this policy, even if investigation finds that they were mistaken.

7.6 B&B Precision Engineering Huddersfield Ltd will ensure that no one suffers any detrimental treatment as a result of refusing to accept or offer a bribe or other corrupt activities or because they reported a concern relating to potential act(s) of bribery or corruption.

7.7 Detrimental treatment refers to dismissal, disciplinary action, treats, or unfavourable treatment in relation to the concern the individual raised.

7.8 If you have reason to believe you've been subjected to unjust treatment as a result of a concern or refusal to accept a bribe, you should inform your line manager or the compliance manager immediately.

## Monitoring and reviewing

10.1 B&B Precision Engineering Huddersfield Ltd is responsible for monitoring the effectiveness of this policy and will review the implementation of it on a regular basis. They will assess its suitability, adequacy, and effectiveness.

10.2 Internal control systems and procedures designed to prevent bribery and corruption are subject to regular audits to ensure that they are effective in practice.

**This document was last reviewed on 06/02/2018 by Oliver Gwynne**