

SECTION FOUR

POLICIES

BRIBERY / GIFTS POLICY

1. Statement

1.1 CJP Sales Limited does not tolerate bribery or corruption in any form. This policy sets out how we will identify and respond to suspected bribery and protect our staff.

1.2 The Bribery Act 2010 came into force on 1 July 2011. There are four possible offences:

- offering, promising or giving bribes;
- requesting, agreeing to receive or accepting bribes;
- bribery of a foreign public official;
- failure of a commercial organisation to prevent bribery.

1.3 Definitions:

- Bribery is when a person offers, gives, receives or solicits a financial (or other) advantage to another person with the intention of inducing or rewarding that person to act improperly.
- Corruption is a dishonest or fraudulent act by a person in a position of power and typically involves a form of financial or other material gain.
- Gifts: These are defined as any item of value provided or offered for personal benefit at a cost that is less than its commercial value or, no cost.
- Hospitality: Covers a wide spectrum and can include: Free meals, drinks, receptions, meetings sponsored by associates, hospitality tents at shows, exhibitions or conferences, music and cultural events, sport and leisure events, hotel accommodation and holidays.
- Payment in kind: A payment in kind includes gifts, services, advertising, attendance at fundraising events or support for a think tank with political connections.

2. Procedure

2.1 You should never offer, give, request or accept any bribe, whether in cash or by way of any other type of illicit payment, to or from any person or company, wherever they are situated and whether they are:

- a public official or body
- a private person
- a company
- any individual employee or other person or body acting on CJP Sales Limited's behalf
- another employee (this exclusion does not extend to private gifts between individuals or within teams such as wedding/leaving presents)

2.1 You should never engage in any internal action which encourages, implies, gives, tolerates or promises an unfair, unlawful, improper or unethical advantage to any individual, group or organisation, regardless of whether there is financial inducement or not.

2.2 You should never accept a bribe to encourage a favourable investment or regulatory decision, property transaction or other business outcome.

2.3 A bribe does not need to be money – it can be any form of advantage, for example the award of a contract, hospitality or gifts or an offer of employment.

2.4 A recipient of a bribe does not need to benefit personally nor does the benefit need to be received – an offer or request is an offence.

2.5 Any offer of or request for a bribe should be reported to a Director immediately.

2.6 Everyone in a position of management within CJP Sales Limited has an obligation to not allow others to misuse their position.

2.7 If an offence is committed with the consent or connivance of a manager they could be personally held liable and subject to formal action.

2.8 Any employee or associated person who is discovered to be giving or taking bribes or any other acts of corruption, will be subject to disciplinary action. This may ultimately lead to dismissal and, if appropriate, criminal proceedings.

3. Receiving and giving gifts

3.1 You can accept small non-alcoholic gifts up to £10 without prior permission or making a declaration. Otherwise, before accepting most gifts or hospitality you should get permission from a Director.

3.2 You must then declare what you have accepted in writing. If you are unsure of the value of an offered gift, or are in doubt about what is acceptable, please discuss this with a Director and agree how to proceed.

3.3 You may accept the following:

- Items of nominal value such as free pens, calendars and similar items
- Gifts where refusal would cause needless offence and the giver is not seeking a decision or business but merely wishes to express thanks for advice, help or co-operation received
- Gifts of alcohol which should be declared
- Christmas gifts which should be declared

3.4 You must not do the following:

- Accept cash or personal gifts with a significant monetary value under any circumstances
- Ask for, or solicit, personal gifts under any circumstances
- Request or accept a gift if you or another person are involved in on-going commercial negotiations where a decision could be influenced.

3.5 Declining gifts

When declining a gift, be courteous but firm and draw the attention of the person making the gift to the existence of this policy.

4. How to raise a concern

4.1 You are required to report any incident or behaviour that does not adhere to this policy and is an attempt to influence CJP Sales Limited.

4.2 You must also report if you are offered a bribe by a third party, are asked to make one, or suspect that this may happen in the future. This is the case even if an offer is not accepted.

4.3 There will be occasions when it is not clear if someone is attempting to offer or solicit a bribe. You are encouraged to raise a concern even in doubtful cases.

4.4 If you are unsure about whether a course of action is right or wrong, ask yourself the following questions:

- Would you be happy if your colleagues or the press knew about it?
- Would you be proud to tell your friends and family about it?
- Does it sit well with our values?

If the answer is 'no' to any of these questions, seek advice immediately.

4.5 All concerns must be reported to a Director.