

## Anti-Bribery & Corruption Policy

GPW0011.2



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# 1. Definitions

For the purpose of this policy, “we”, “us” and “the Company” mean GPW Design Services Ltd.

“Bribe” means an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage; “to Bribe” and “Bribery” are construed accordingly.

“Relevant Person” means any individual (whether an officer of employees of the Company, or a temporary worker, contractor or consultant providing services to or on behalf of the Company) or any corporate entity who performs functions for or on behalf of the Company.

# 2. Introduction

One of the Company’s core values is to uphold responsibility and fair business practice. It is committed to promoting and maintaining the highest level of ethical standards in relation to all of its business activities. Its reputation for maintaining lawful business practice is of paramount importance and this Policy is designed to these values.

GPW Design Services Ltd has a zero-tolerance policy towards bribery and corruption and is committed to acting fairly and with integrity in all of its business dealings and relationships and to implementing and enforcing effective systems to counter bribery.

# 3. Purpose and Scope of the Policy

This Policy sets out the steps all of us must take to prevent bribery and corruption in our business and to comply with relevant legislation. Its aimed at:

- ✓ Ensuring compliance with anti-bribery laws, rules and regulations, not just within the UK but in any other country within which the Company may carry out its business or in relation to which its business may be connected;
- ✓ Enabling any Relevant Person to understand the risks associated with bribery and to encourage them to be vigilant and effectively recognise, prevent and report any wrongdoing, whether by themselves and others;
- ✓ Providing suitable and secure reporting and communication channels and ensuring that any information that is reported is properly and effectively dealt with;
- ✓ Creating and maintaining a rigorous and effective framework for dealing with any suspected instances of bribery or corruption

All Relevant Persons are expected to adhere to principles set out in this Policy.

## 4. The Bribery Act 2010

The Bribery Act, which came into force on 1 July 2011, makes it an offence for a UK national or person located in the UK to pay or receive a bribe, either directly or indirectly.

Under the Act, it is an offence to:

- ✓ Bribe another person i.e. offering, promising or giving a financial or other advantage to a person to induce or reward a person to perform a relevant function or act improperly.
- ✓ Receiving a bribe, i.e. accepting, receiving or requesting a financial or other advantage as a reward for performing a relevant function or action improperly.
- ✓ Bribe a foreign public official (using a bribe to influence a foreign public official to obtain or retain business or a business advantage)
- ✓ Failing to prevent bribery

## 5. Indication of Bribery

Common indicators of corruption include, but are not limited to:

- ✓ Payments of an abnormal amount (e.g. commission), or if they are made in an unusual way, for example, a payment that would usually be made in a single payment, is now made in stages via a bank account never previously used, or in a currency, or via a country that has no connection with the transaction;
- ✓ The process is bypassed for approval or sign-off of terms or submission of tender documents, payments, or other commercial matters; those whose job it is to monitor commercial processes (the Operations Director) may be prevented from or hindered in doing so;
- ✓ Individuals are secretive about certain matters or relationships and/or insist on dealing with them personally. They may make trips at short notice without explanation, or have a more lavish lifestyle than expected.
- ✓ If decisions are taken for which there is no clear rationale
- ✓ If records are incomplete or missing

## 6. The Risks of Not Acting with Integrity

Involvement in bribery or corruption carries many risks. These include:

- ✓ A Company which pays or accepts bribes is not in control of its business and is at risk of blackmail;
- ✓ If the Company is found guilty of bribery or even of failing to have adequate procedures in place to prevent bribery, it will be subject to unlimited fines;
- ✓ Any person found guilty of bribery will be subject to fines and/or imprisonment of up to 10 years;
- ✓ A public exposure, or even allegation, of bribery would entail severe reputational damage. The Company's banking or supply facilities might be withdrawn or be available on much less favourable terms, and the Company could be blacklisted as an approved tenderer for both public and private sector contracts;
- ✓ The cost of our insurance could increase very significantly; and
- ✓ Good people will not want to work for us

## 7. The Benefits of Acting with Integrity

As well as risks, there are also clear benefits to acting with propriety. These include:

- ✓ Increases the chances of GPW Design Services Ltd of being selected as a supplier in both the public and private sectors;
- ✓ We remain in good standing with our banks and our own suppliers and they will want to keep doing business with us;
- ✓ A business with high ethical standards is a good place to work; and
- ✓ It is a requirement of the REC Code of Professional Practice that we act with integrity at all times.

## 8. Gifts and Hospitality

GPW Design Services Ltd occasionally provides gifts and hospitality to clients, customers, contractors and suppliers. This is not prohibited by the Bribery Act provided the following requirements are met:

- ✓ The gift is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of a business or business advantage;
- ✓ It complies with the local laws;
- ✓ It is given in the Company's name, not in the giver's personal name;
- ✓ It does not include cash or a cash equivalent (such as gift vouchers);
- ✓ It is of an appropriate and reasonable type and value and given at an appropriate time;
- ✓ It is given openly, not securely;
- ✓ It is approved in advance by a director of GPW Design Services Ltd

It is not acceptable to give, promise to give, or offer a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given, or to accept a payment, gift or hospitality from a third party that you know or suspect is offered or provided with the expectation that it will obtain a business advantage for them.

## 9. Facilitation Payments

Any payment or gift to a public official or other person to secure or accelerate the prompt or proper performance of a routine government procedure or process, otherwise known as a "facilitation payment", is also strictly prohibited. Facilitation payments are not commonly paid in the UK but they are common in some other jurisdictions.

## 10. Political Contributions

Employees should be aware that contributions can be (or be seen as) bribes in disguise. GPW Design Services Ltd do not make any donations to political parties. No individual is to make a donation stated to be, or which could be taken to be, on our behalf without prior approval of the Board. Employees are permitted to make political donations in a personal capacity, but they must be sensitive to how such contributions could be perceived, especially by those who are aware of your connection with the Company.

## 11. Local Circumstances

GPW Design Services Ltd understand that different parts of the world have different social and cultural customs. This does not affect the Company's position that we do not pay or accept bribes or act corruptly. However, subject to that position, we understand the needs to be sensitive to local customs. For example, there are cultures in which refusing to accept, or failing to offer a gift, is considered impolite, and may therefore alienate a key contact. In such cases, please ask the Managing Director to advise.

## 12. Exceptional Circumstances

In some circumstances, a payment is justifiable. If one of our people is faced with a threat to his/her personal safety or that of another person if a payment is not made, they should pay it without fear of recrimination. In such cases, however, a Director must be contacted as soon as possible, and the payment and the circumstances in which it was made must be fully documented and reported to the Managing Director of the business within five working days.

Such cases will be rare. All Relevant Persons visiting regions where they are more common should familiarise themselves, prior to travel, with current guidance relating to those countries. A Director should be consulted if in doubt.

## 13. Responsibility to Report and the Reporting Procedure

All Relevant Persons are contractually required to take whatever reasonable steps are necessary to ensure compliance with this Policy and to prevent, detect and report any suspected bribery or corruption. All Relevant Persons have a duty to prevent, detect and report any incident of bribery and any potential risks of bribery. If you know or suspect that any Relevant Person plans to offer, promise or give a bribe or to request, agree to receive or accept a bribe in connection with the Company's business, you must disclose this to a Director as quickly as possible to allow appropriate action to be taken promptly.

GPW Design Services Ltd is committed to taking appropriate action against bribery and corruption. This may include either reporting the matter to an appropriate external government department, regulatory agency or the police and/or taking internal disciplinary action against relevant employees and/or terminating contracts with associated persons.

GPW Design Services Ltd will keep your disclosure confidential during any investigation it undertakes to the extent that this is practical and appropriate in the circumstances. GPW Design Services Ltd will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. The Company is also committed to ensuring nobody suffers the detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or corruption offence has taken place or may take place in the future or because they may assist in the investigation of an allegation of Bribery or corruption.



## 14. Record Keeping

All accounts, receipts, invoices and other documents and records relating to dealings with third parties must be prepared and maintained with strict accuracy and completeness. No accounts must be kept “off the record” to facilitate or conceal improper payments.

## 15. Monitoring Compliance

The Company’s Operations Manager has primary responsibility for ensuring compliance with this Policy and will review its content on a regular basis. S/he will be responsible for monitoring its effectiveness and will provide regular reports in this regard to the directors of the Company who have overall responsibility for ensuring this Policy complies with the Company’s legal and ethical obligations.

## 16. Training

The Company will provide training to all employees to help them understand their duties and responsibilities under this Policy. The Company’s zero tolerance approach to bribery will also be communicated to all business partners at the outset of the business relationship with them and as appropriate there after.

## 17. Policy Statement

Bribery of any kind is strictly prohibited. Under no circumstances should any provision be made, money set aside or accounts created for the purposes of facilitating the payment or receipt of a bribe. All relevant Persons and all Associated Persons are expected to adhere strictly at all times to the guidelines set out in this Policy.

A breach of any of the provisions of this Policy by any Relevant Person who is an officer or employee of the Company will constitute a disciplinary offence and will be dealt with in accordance with the Company’s disciplinary procedure. Depending on the gravity of the offence, it may be treated as gross misconduct and could render the employee liable to summary dismissal.

Breach of this policy by any Relevant Person who is a temporary worker, contractor or consultant providing his/her services to the Company may lead to the immediate termination of that temporary worker’s contractor’s or consultant’s engagement by the Company.

Breach of this policy by any Relevant Person which is a corporate entity could lead to the suspension or termination of any relevant contract, sub-contract or other agreement between the corporate entity and the Company.



# Thank you. Ready to recruit?

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