

# Anti-Bribery and Corruption Policy Statement.

**Document Name** Anti-Bribery and Corruption Policy Statement

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**Revision No** V1.2

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**Approved By** Claire Nelson, Head of HR

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**Review Date** 16/11/2022

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**Classification** Public

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## 1. Introduction

At Connect Managed Services (UK) Limited (Connect), we are committed to conducting our business ethically and honestly in every territory where we do business, as well as complying with all applicable laws in those countries. This includes compliance with:

- i. Bribery Act 2010
- ii. OECD Convention Combating Bribery of Foreign Public Officials in International Business Transactions
- iii. United Nations Convention against Corruption

The Purpose of this document is to set out our policy in relation to bribery and corruption. The Policy applies strictly to any Employee, contractor or any party with which Connect does business or who might conduct business in our behalf. For reference purposes, the Company Compliance officer for Connect is the Governance & Compliance Manager.

## 2. Anti-Bribery Policy Statement

A bribe is a financial advantage or other reward that is offered to, given to, or received by an individual or company (whether directly or indirectly) to induce or influence that individual or company to perform public or corporate functions or duties improperly.

Corruption is the misuse of public office or power for private gain, or misuse of private power in relation to business outside the realm of government.

Acts of bribery or corruption are designed to influence the individual in the performance of their duty and incline them to act dishonestly. The person being bribed is generally someone who will be able to obtain, retain or direct business. This may involve initiatives such as buying or selling, or it may involve the handling of administrative tasks such as licences, customs, visas or taxes. It does not matter whether the act of bribery is committed before or after the activity has been taken.

Connect prohibits the offering, giving, solicitation or the acceptance of any bribe or corrupt inducement, whether in cash or in any other form:

- to or from any person or company wherever located, whether a public official or public body, or a private person or company.
- by any Connect Employees for whatever reason.
- in order to gain any commercial, contractual or regulatory advantage for Connect in a way, which is unethical, or in order to gain any personal advantage, pecuniary or otherwise, for the individuals or anyone connected with the individual.

## 3. Gifts and Hospitality

This policy does not prohibit giving and receiving promotional gifts of low value and normal appropriate hospitality. However, in certain circumstances gifts and hospitality may amount to bribery. We will not provide gifts or hospitality of disproportionate value or with the intention of persuading anyone to act improperly or to influence a public official in the performance of his duties. All expense claims relating to hospitality, gifts or expenses incurred to third parties must be submitted in accordance with our Expenses Policy and the specific reason for the expenditure should be recorded.

## 4. Facilitation Payments and Kickbacks

We do not make, and will not accept, facilitation payments or “kickbacks” of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine action by a government official. Kickbacks are typically payments made in return for a business favour or advantage. All Connect must avoid activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.

## **5. Due Diligence**

In order to comply with this policy, Connect Employees must carry out appropriate due diligence checks before engaging third parties. It is beneficial to carry out this procedure in respect of any countries where business is conducted so you are aware of any specific risks. Third parties should only be engaged where there is a clear business rationale for doing so, with an appropriate contract. Any payments to third parties should be properly authorised and recorded.

## **6. Adherence**

It may not be easy to make a decision if something is appropriate. If you are in doubt as to whether a potential act is in breach of this policy, the matter should be referred to our Governance & Compliance Officer.

## **7. Reporting Bribery**

You have a duty to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you become aware or suspect that an activity or conduct, which is proposed or has taken place is a bribe or corrupt, you must report it immediately to our Governance & Compliance Officer.

You can provide information anonymously if you prefer. In all instances, every effort will be made to ensure that information relating to a reported breach is kept confidential and communicated on a need-to know basis. No employee or third party will suffer any detriment as a result of raising genuine concerns about bribery, even if they turn out to be mistaken.

## **8. Investigation**

Connect will investigate seriously any actual or suspected breach of this policy, or the spirit of this policy. Employees may be subject to disciplinary action and which may ultimately result in dismissal. In the case of third parties found to be bribing or attempting to bribe Connect Employees, they will be informed in writing, business dealings will be ceased, and the appropriate authorities will be informed.

## **9. Information Classification**

The policy is classified as Public.

## **10. Review**

This Policy shall be reviewed on an annual basis, unless changes to business operations, relevant legislation or codes of practice necessitate an earlier amendment.

## **11. Version Control**

Date	Version	Changes	Reviewer Name & Job Title	Approver Name & Job Title
22/10/2021	V1.0	Initial Version	Dimitris Damianou, Compliance Assistant	Mark Evans, VP Operations
10/12/2021	V1.1	New Brand, add paragraphs and Add OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions and United Nations Convention against Corruption	Dimitris Damianou, Compliance Assistant	Mark Evans, VP Operations
16/11/2022	V1.2	Annual Review, No update	Dimitris Damianou, Paralegal	Claire Nelson, Head of HR