
Bribery: Anti-Bribery Policy

1.0 General Philosophy

The Company complies with the Bribery Act 2010.

It is an offence under the Bribery Act 2010 to:

- Offer, promise or give a bribe.
- Request, agree to or receive or accept a bribe.
- Bribe a foreign public official.
- Fails to prevent bribery by persons 'associated' with the Company.

It is important to ensure that no employee acts in any way that is inconsistent with the Company's objectives or with the integrity of the business.

In general, the Company does not believe that it is appropriate for employees (and persons associated with the Company) to accept / give gifts from / to customers, suppliers or any other person or organisation with which the Company has (or might wish to have) business connections.

2.0 Aim and Scope

This policy applies to all employees, officers and 'associated persons' of the Company, within the UK and overseas. Every employee and associated person acting for, or on behalf of, the Company is responsible for maintaining the highest standards of business conduct. Any breach of the policy will be regarded as misconduct, leading to disciplinary action up to and including summary dismissal. Actions could also constitute contractual and criminal matters for the individual concerned and the relevant authorities informed.

3.0 Policy Framework**3.1 Offering a bribe.**

Employees will face disciplinary action where it is deemed that the employee has offered, promised or given a '*financial or other advantage*' to another person where they **intend** the advantage to bring about improper performance or acquire new business as a consequence.

Any gifts that are offered as a result of the manager's discretion have to be recorded in a central register. The register should be kept by Human Resources or where HR is not located in the subsidiary, then it should be registered in the Finance department.

3.2 Receipt of gifts – disclosure

Any employee who receives a gift of any kind from an existing or potential business contact must disclose the fact of the gift, its nature and the identity of the sender to his/her line manager / Human Resources. If the gift is anything other than a small token of appreciation having no substantial financial value, the employee will be required to return the gift.

If, in the opinion of the line manager, the gift might constitute a bribe or other inducement, the employee will be asked to pass the gift to their senior manager, who will return it to the sender with a suitable letter explaining the Company's policy and asking that it be respected in the future.

In cases where the employee's line manager agrees that the gift was sent to the employee as a token of gratitude for work carried out to a particularly high standard or for an exceptional level of service given, the employee may, at the line manager's discretion, be permitted to retain the gift. Thus small gifts that are genuinely given as a token of appreciation or gratitude will be acceptable, provided that the employee properly declares the gift in line with this policy and provided that the employee does not subsequently treat the person who sent the gift more favourably than other customers/suppliers, etc.

Any gifts that are retained as a result of the manager's discretion have to be recorded in a central register. The register should be kept by Human Resources or where HR is not located in the subsidiary, then it should be registered in the Finance department.

[This policy does not apply to promotional gifts, ie items such as stationery or pens that bear the logo or company name of another organisation, provided that these have no significant value. However, since it is likely that such gifts will be received by only a limited number of employees, they should be shared amongst other members of staff where appropriate. For avoidance of doubt employees are encouraged to gain confirmation on acceptance from their immediate manager / Human Resources].

3.2 Hospitality

'Reasonable, proportionate' hospitality and promotional expenditure *'made in good faith [as] an established and important part of doing that business'* will not be penalised. This applies to conducting hospitality for IG Design Group or receiving hospitality from established business contacts. However, where the payment, gift or hospitality is extraordinary or lavish, or has the ability / intent to influence or reward improper performance by the recipient, then this **will** be considered as bribery / fraud and will be dealt in accordance with this policy.

If there is any doubt, hospitality events should be disclosed to a Director who will discuss with his / her fellow directors / Human Resources and decide if the hospitality is appropriate or not. If deemed appropriate all hospitality events need to also be recorded on the central register.

3.3 Reporting acts of Bribery / Fraud

Employees are 'associated persons' are encouraged to report acts of corruption as soon as possible to their immediate manager / Human Resources, and this can be done in a safe and confidential manner in accordance with the Whistleblowing Policy.

3.4 Risk Management

The Company will identify high risk areas, and high risk projects (eg projects undertaken in high-risk countries, tenders for work and those working on high-value projects) and will include in their risk registers showing actions to mitigate the risk.

The Company will also apply the same measures with persons 'associated with' the company.

3.5 Communicating the Policy

The Company will make available this policy to all employees through the Human Resources Departments and on any intranet / HR Policy Centres. Human Resources will conduct training sessions with members of staff and maintain a record of those people who have received training to ensure everyone is aware of the policy and the implications to themselves.

All new contracts of employment from 1st July 2011 will contain reference to the Bribery Policy and all new employees will be issued a copy of the Policy Statement and sign to confirm receipt.

3.6 'Persons Associated with'

'Persons associated with' means persons who perform services for and on behalf of the IG Design Group which therefore includes (but is not limited to) employees, agents, contractors, advisors, distributors and consultants.

4.0 Cross References

[Whistleblowing Policy](#)

[Disciplinary Policy](#)

[Fraud Policy](#)