

Spliceteq South Communications Ltd (Hereinafter in this document referred to as the Company) are fully committed to implementing and enforcing effective systems to counter bribery and corruption. Therefore it is the Companies Policy to conduct all aspects of its business in an honest and ethical manner at all times

This Policy applies to all individuals working for the Company, including anyone providing services to the Company such as consultants or sub-contractors.

POLICY AIM

The aim of this Policy is to help the Company act in accordance with the Bribery Act 2010, maintain the highest possible standards of business practice and advise individuals of the Companies “zero tolerance” to bribery and corruption.

THE LAW

Under UK law bribery and corruption is punishable for individuals by up to ten years imprisonment. If the Company is found to have taken part in the bribery or corruption or lack adequate procedures to prevent these acts it could face an unlimited fine and could be excluded from tendering for contracts.

POLICY

This Policy applies to all permanent and fixed-term staff employed by the Company and any contractors, consultants or other persons acting under or on behalf of the Company.

The Company will not:

- Make contributions of any kind with the purpose of gaining any commercial advantage.
- Provide gifts or hospitality with the intention of persuading anyone to act improperly or to influence an individual in the performance of their duties.
- Make or accepts “kickbacks” of any kind.

The Company will:

- Keep appropriate internal records that will evidence the business reason for making any payments to third parties.
- Encourage employees to raise concerns about any issue or suspicion of malpractice at the earliest possible stage.
- See that anyone raising a concern about bribery or corruption will not suffer any detriment as a result, even if they turn out to be mistaken.

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EMPLOYEE RESPONSIBILITY

Employees must not:

- Accept any financial or other reward from any person in return for providing some favour.
- Request a financial or other reward from any person in return for providing some favour.
- Offer any financial or other reward from any person in return for providing some favour.

GIFTS AND HOSPITALITY

This Policy does not prohibit giving and receiving promotional gifts of low value or normal or appropriate hospitality.

Receiving Business Gifts:

Receiving promotional gifts of low value is normal and appropriate, however gifts with a value exceeding £50 may not be accepted with approval from the Managing Director or Operations Director. Any Gift offered and then refused because of its value must be reported to the Managing Director or Operations Director.

Offering Business Gifts:

Business gifts are primarily aimed at thanking clients or suppliers for their custom and loyalty, only authorised gifts may be given.

Receiving Hospitality:

The acceptance of corporate hospitality must be transparent, all invitations must be reported to the Managing Director or Operations Director before an employee accepts any invitation. The following areas are exempt while attending conferences or seminars sponsored by third parties.

- Business and travel expenses incurred.
- Normal business lunches and meals.

Offering Gifts and Hospitality:

Company hospitality is primary aimed at thanking clients and suppliers for their custom and loyalty. All hospitality events must have approval in advance from the Managing Director or Operations Director.

DONATIONS TO ORGANISATIONS

No donations should be made to charities, political parties or other organisations without prior approval from the Managing Director or Operations Director.

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NON COMPLIANCE STAFF

Failing to observe the Company Policy may lead to disciplinary action in accordance with the Companies Disciplinary Policy.

NON COMPLIANCE CLIENTS, SUPPLIERS OR OTHERS

In the event of a breach of the Company Policy by other organisations or individuals the Company will take the appropriate action.

MONITORING THE POLICY

The Company Policy will be monitored on an ongoing basis to ensure that it address issues effectively. The following will be monitored:

- That all individuals working for the Company are advised of the Companies Policy.
- Assessment of any reported incident or related occurrence.

Monitoring of the Company Policy is essential to assess how effective the Company has been to establish control of its obligations.

DEFINITIONS

Bribe is a financial or other advantage offered to given to anyone to persuade them to or reward them for performing their duties improperly or with the intention of influencing them in the performance of their duties.

Hospitality is the practice of being hospitable, this includes the reception and entertainment of guests or visitors.

Kickbacks or facilitation payments are typically small payments made in return for a business favour or advantage.

REVIEWING THE POLICY

This Policy will be reviewed and if necessary revised in the light of legislative or organisational changes. Improvements will be made by learning from experience and the use of established reviews.

POLICY AMMENDMENTS

Should any amendments, revisions or updates be made to this Policy it is the responsibility of the Operations Director to see that all relevant Employees, Clients and Suppliers receive notice of the update.

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Paul Parkinson
Paul Parkinson
CEO
21/06/2024

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