



## **Anti-Bribery and Corruption Policy**

### **Policy statement**

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity, in all our business dealings and relationships.

Corb Ltd will constantly uphold all laws relating to the anti-bribery and corruption in all the jurisdictions in which we operate. We are bound by the laws of the UK, including the Bribery Act 2010, in regard to our conduct both at home and abroad.

### **Application**

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors, external consultants, third party representatives and business partners.

In the context of this policy third party refers to any individual or organisation our company meets and works with. It refers to actual and potential clients, customers, suppliers, distributors, business contacts, advisors, and government and public bodies, this also includes their advisors, representatives and officials politicians and public parties.

Any arrangements a company makes with a third party is subject to contractual terms including specific provisions that require the third party to comply with minimum standards and procedures relating to anti bribery and corruption.

This policy does not form part of an employee's contract of employment and called limited may amend it at any time so to improve its effectiveness at combatting bribery and corruption.

### **What is Bribery?**

A bribe is a financial or other inducement or reward for action which is illegal, unethical, a breach of trust, or improper in anyway. Bribes can take the form of money, gifts, loans, fees, hospitality services, discounts, the award of contract, or any other advantage or benefit.

Bribery includes offering, bribe. All forms of bribery are strictly prohibited. Nobody on behalf of the organisation shall:

- give or offer any payment, gift, hospitality, or other benefits in expectation that a business advantage will be received in return or to reward any business received.
- accept any offer from a third party that you know or suspect is made with the expectation that we will provide a business advantage from them or anyone else.
- offer any payment, [sometimes called a facilitation payment] to a government official in any country to facilitate or speed up a routine or necessary procedure.
- make donations, whether in cash, kind or by any other means, to support political parties or candidates.

This policy does not prohibit the giving or accepting of reasonable and appropriate hospitality from legitimate purposes such as building relationships, maintaining our image, or reputation. Or marketing our products and services. These should not be unduly lavish or extravagant. Or seen as an inducement or reward for any preferential treatment [for example, during contractual negotiations or a tender process] such gifts or hospitality will always be given in the company's name, not personally.

## **Record Keeping**

Corb Ltd will keep detailed and accurate financial appropriate internal controls in place to act as evidence for all payments made. We will declare and keep a written record of the amount and reason for hospitality or gifts accepted and given an understand that gifts, an act of hospitality, are subject to managerial review.

## **Employee Responsibilities**

As an employee of Corb Ltd. You must ensure that you read, understand and comply with the information contained within this policy. And with any training or other anti-bribery and corruption information you are given.

All employees and those under our control are equally responsible for the prevention, detection and reporting of bribery and other forms of corruption. They have acquired to avoid any activities that could lead to or imply a breach of this anti bribery policy.

If you have reason to believe or suspect that an instance of bribery or corruption has occurred, or will occur in the future that breaches this policy, you must notify the compliance manager.

If an employee breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct. Corb Ltd has the right to terminate a contractual relationship with an employee if they breach this anti bribery policy.

You are under obligation to inform your compliance manager as soon as possible if you are offered a bribe by anyone, or if you were asked to make one if you suspect that you may be bribed, or if you are asked to make a bribe in the near future, or if you have reason to believe that your victim of another corrupt activity.

## **Raising Concerns & Protection**

If you suspect that there is an instance of bribery or corrupt activities a clearing in relation to Corb Ltd, you must raise your concerns at as early stages possible. If you are uncertain about whether a certain action or behaviour can be considered bribery corruption, you should speak to your line manager the compliance manager, or the director.

Corb Ltd will ensure that no one suffers any detrimental treatment as a result of refusing to accept or offer a bribe, or other corrupt activities, because they reported a concern relating to potential acts of bribery or corruption.

Signed:  \_\_\_\_\_

Position: Business Development Manager

Date: 8th May 2023