

# Anti-bribery & Corruption Policy

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## Contents

1	Scope of the Policy .....	1
2	Policy Statement .....	1
3	Responsibilities .....	2
4	Communication and review .....	2
5	Further information and guidance .....	2

## 1 Scope of the Policy

All EMEC employees and others acting on behalf of EMEC must comply with this Anti-Bribery and Corruption Policy and it extends to all business dealings and transactions in the UK and in all countries in which EMEC operates. It is essential that EMEC conducts an effective process of due diligence prior to entering into significant business relationships and that a record is kept of this process.

Any breach of the policy is likely to constitute a serious disciplinary, contractual and criminal matter for the individual concerned. This could constitute gross misconduct for which an offending employee may be dismissed without notice. It may also cause serious damage to the reputation and standing of EMEC.

## 2 Policy Statement

The Bribery Act 2010 came into force on 1 July 2011 and creates a framework of five criminal offences:

- Giving, promising, and offering of a bribe
- Agreeing to receive or accept a bribe
- Bribing a foreign official
- Failure of commercial organisations to prevent bribery
- A senior officer of a commercial organisation consenting to or conniving in an act of bribery

EMEC anti-bribery and corruption principles:

- We will carry out business fairly, honestly and openly.
- We will not give or offer any money, gift, hospitality or other advantage to any person carrying out a business or public role, or to a third party associated with that person, to get them to do something improper.
- We will not give or offer any money, gift, hospitality or other advantages to any foreign public official with the intention of influencing them to our business advantage.
- We will not use intermediaries or contractors for the purpose of committing acts of bribery.
- We will not allow employees to accept money, gifts, hospitality and other advantages from business associates, actual or potential suppliers, or service providers which are intended to influence a business decision or transaction in some improper way.
- Any employee found to be in breach of these principles will face disciplinary action.

- No employee will suffer demotion, penalty, or other adverse consequence for refusing to pay bribes, even if it may result in EMEC losing business.
- We will avoid doing business with others who do not commit to conducting business without bribery.

### **3 Responsibilities**

Any concerns relating to a breach of the Policy should be reported in one of the following ways:

- Your line manager
- The Managing Director
- The Finance Director

### **4 Communication and review**

This policy will be communicated to staff via the Employee Handbook, during induction, and at staff meetings.

This policy will be reviewed on a biennial basis.

### **5 Further information and guidance**

This policy sets out the key principles which EMEC must adhere to. The Bribery Act 2010 can be viewed at:

<http://www.legislation.gov.uk/ukpga/2010/23/contents?view=plain>