



Colloide



Anti-Bribery & Corruption Policy

CES IMS-POL1

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Policy Statement

It is Colloide Engineering Systems' policy to conduct all of its business in an honest and ethical manner. Colloide takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships wherever it operates and implementing and enforcing effective systems to counter bribery.

Colloide will uphold all laws relevant to countering bribery and corruption. It remains bound by the laws of the UK, including the Bribery Act 2010, in respect of its conduct both at home and abroad.

The purpose of this policy is to:

- a) Set out Colloide's responsibilities, and of those working for Colloide, in observing and upholding Colloide's position on bribery and corruption; and
- b) Provide information and guidance to those working for Colloide on how to recognise and deal with bribery and corruption issues.

Bribery and corruption are punishable for individuals by up to ten years' imprisonment and if Colloide is found to have taken part in corruption it could face an unlimited fine and damage to its reputation. Colloide therefore takes its legal responsibilities very seriously.

In this policy, third party means any individual or organisation you come into contact with during the course of your work for Colloide, and includes actual and potential customers, suppliers, distributors, business contacts, agents, clients, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

Who is Covered by this Policy?

This policy applies to all individuals working at all levels and grades within Colloide and consultants, contractors/subcontractors, trainees, seconded staff, agency staff, agents, or any other person associated with Colloide, wherever located (collectively referred to as workers in this policy).

What is Bribery?

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. Examples are provided in Attachment 1.

Gifts & Hospitality

This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties.

The giving or receipt of gifts is not prohibited, if the following requirements are met:

- It is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
- It does not include cash or a cash equivalent (such as gift certificates or vouchers);

- Taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time: for example, in the UK it can be customary for small gifts to be given at Christmas;
- It is given openly, not secretly; and
- Gifts should not be offered to, or accepted from, government officials or representatives, regulators or representatives or politicians or political parties, without the prior approval of the Managing Director and in accordance with agreed authority levels.

What is not Acceptable?

It is not acceptable for you (or someone on your behalf) to:

- Give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- Give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure;
- Accept payment from a third party that you know, or suspect is offered with the expectation that it will obtain a business advantage for them;
- Accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by Colloide in return;
- Threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
- Engage in any activity that might lead to a breach of this policy.

Facilitation Payments & Kickbacks

Colloide does 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 government action by a government official. They are not commonly paid in the UK but are common in some other jurisdictions.

If you are asked to make a payment on Colloide's behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt which details the reason for the payment. If you have any suspicions, concerns or queries regarding a payment, you should raise these with the Company Secretary.

Kickbacks are typically payments made in return for a business favour or advantage. All workers must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by Colloide.

Donations

Colloide does not make contributions to political parties. Colloide only makes charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made unless they are given in accordance with agreed procedures.

Your Responsibilities

You must ensure that you read, understand and comply with this policy. You should also comply with Colloide's policies on Ethical Dealing and Whistleblowing.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for Colloide or under Colloide's control. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your line manager and the Company Secretary as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future. For example, if a client or potential client offers you something to gain a business advantage with Colloide or indicates to you that a gift or payment is required to secure their business. Further "red flags" that may indicate bribery or corruption are set out in Attachment 2.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. Colloide reserves its right to terminate its contractual relationship with other workers if they breach this policy.

How to Raise a Concern or Query?

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries, these should be raised with the Company Secretary.

What to do if you are a Victim of Bribery or Corruption?

It is important that you tell your line manager and the Company Secretary as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

Training & Communication

Training on this policy forms part of the induction process for all new workers. All existing workers will receive guidance in relation to this policy.

Colloide's zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of the business relationship with them and as appropriate thereafter.

Who is Responsible for the Policy?

The company management team has overall responsibility for ensuring this policy complies with Colloide's legal and ethical obligations, and that all those under Colloide's control comply with it.

Monitoring & Review

The Company Secretary has primary and day-to-day responsibility for this policy and dealing with any queries on its interpretation. The Risk Management Committee is responsible for the monitoring and effectiveness of this policy. Management at all levels are responsible for

ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

All workers are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

Workers are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Company Secretary.

This policy does not form part of any employee's contract of employment, and it may be amended at any time.

SIGNED BY:



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Date Reviewed: 14th October 2022

Date of Next Review: 14th October 2023