



## Gradsouthwest Limited

### Anti-bribery policy

This is the Anti-bribery policy statement for third parties performing services for or on behalf of Gradsouthwest Ltd ("Gradsouthwest").

(1) Gradsouthwest's intentions are to maintain high ethical standards across all its activities.

(2) Gradsouthwest expects every business and individual performing services for it or on its behalf to do so in an honest and professional manner.

(3) Gradsouthwest does not tolerate any form of bribery, whether direct or indirect, by its agents, consultants, contractors, suppliers, subsidiaries, joint venture partners and any other third parties performing services for or on behalf of Gradsouthwest.

(4) All such third parties must comply with Gradsouthwest's standards with regard to bribery and with the requirements of the Bribery Act 2010, and must ensure that their staff are required to comply with those standards and requirements and receive appropriate training. Gradsouthwest may require a written assurance from a third party of their compliance with Gradsouthwest's standards and the requirements of the Act, including details of the anti-bribery measures that they have taken.

(5) Under the Bribery Act, a bribe is a "financial or other advantage" offered, promised or given to induce a person to perform a relevant function or activity improperly, or to reward them for doing so. The Act makes it a criminal offence to:

- offer, promise or give a bribe
- request, agree to receive or accept a bribe
- bribe a foreign official to obtain or retain business or an advantage in the conduct of business
- (by an organisation) fail to prevent bribery by those acting on its behalf in the UK or abroad to obtain or retain business or an advantage in the conduct of business for the organisation.
- Small payments made to government officials or others to make something happen, or happen sooner (commonly called facilitation payments) are likely to be unlawful bribes.
- Individuals should note that bribery is a criminal offence in the UK that may result in up to 10 years' imprisonment and/or an unlimited fine for the individual and an unlimited fine for the organisation on behalf of which the bribery offence is committed.

(6) As part of its anti-bribery measures, Gradsouthwest is committed to proportionate, reasonable and bona-fide hospitality and promotional expenditure. The frequency and scale of any hospitality accepted by a third party should in general not be significantly greater than they or Gradsouthwest would be likely to provide in return. Any expenditure which does not



comply with this principle must be authorised in advance by the appropriate Gradsouthwest Director.

(7) Gradsouthwest will not conduct business with third parties that do not support these anti-bribery objectives.

(8) Gradsouthwest reserves the right to terminate its contractual arrangements with any third party providing services for or on behalf of Gradsouthwest with immediate effect and without compensation for any loss where there is reasonable evidence that they/their staff have committed an act of bribery. Where appropriate, Gradsouthwest will include terms in its contracts with third parties requiring compliance with our standards and with the requirements of the Bribery Act.

(9) All those providing services for or on behalf of Gradsouthwest are encouraged to report any suspected bribery to a Gradsouthwest Director.

Policy agreed: July 2015