



Last revised 02.06.2019

## Anti-bribery policy

### Definition:

A bribe is considered to be an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

### Summary:

ESG is committed to preventing bribery and maintaining a culture within the organisation in which bribery is never acceptable. ESG does not encourage, offer or accept bribes whether internal to the organisation or external to other organisations.

ESG conducts all its business in an honest and ethical manner and with integrity in all our business dealings and relationships and implementing and enforcing effective systems to counter bribery. We uphold all laws including those relevant to countering bribery and corruption in all the jurisdictions in which we operate. We remain bound by the laws of the United Kingdom, including the Bribery Act 2010, in respect of our conduct both at home and abroad.

The purpose of this policy is to set out our responsibilities, and of those working for us, in observing and implementing our position on bribery and on corruption and to provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues. This document forms part of employee induction and is also given as reference to clients and suppliers.

### Who this policy covers:

This policy applies directly to all individuals working at all levels within ESG as employees or agents and any subsidiaries and their employees and agents, wherever located. The policy is provided to other associates of ESG, including our suppliers, who will be required to comply with those provisions of the policy which apply to them by the inclusion of relevant provisions in all contractual arrangements with ESG.

In this policy, "third party" means any individual or organisation that is come into contact with.

### Prohibited actions:

The following is a list of what is prohibited and is not exhaustive



- 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; or
- to 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; or
- to 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; or
- to make or accept any facilitation payments to or from any organisation or government official; or
- to 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 us in return; or
- to threaten, intimidate or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
- to engage in any activity that might lead to a breach of this policy.

## **Exclusions:**

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

The giving or receiving of gifts is not prohibited if all of 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 complies with local law;
- it is given in the name of the organisation;
- it does not include cash or a cash equivalent (such as gift certificates or vouchers);
- it is appropriate in the circumstances, i.e. it is given as a ceremonial gift on a festival or at another special time (e.g. Christmas, Diwali, Eid);
- taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time;
- it is given openly, not secretly; and
- gifts should not be offered to, or accepted from, government officials or representatives, or politicians or political parties, without prior approval.

The practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable, justifiable and open.

## **Individual responsibilities:**



It is the responsibility of all individuals to ensure that all payments are made in accordance with this policy and receipts are always to be obtained.

ESG does not make contributions to political parties. Charitable donations that are legal and ethical under local laws and practices are allowable but no such donation must be offered or made without the prior approval of a Director.

All individuals must ensure that they have read, understood and comply with this policy. The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for ESG or under our control. All individuals are required to avoid any activity that might lead to, or suggest, a breach of this policy. A line manager must be notified as soon as possible if any suspicion of a conflict with this policy has or may occur.

Any individual who breaches this policy may face disciplinary action, which could result in dismissal for gross misconduct.

All individuals must keep a proper financial record of all payments made and received with business reason(s) for making payments. All hospitality or gifts, accepted or offered must be declared to Imad Khanzada on the central corporate gifts register, which will be subject to managerial review.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. These entities should be stored on the corporate network and not deleted under any circumstances.

All individuals are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. These should be raised with a line manager and to Imad Khanzada. The individual which raises any suspicions, whether those suspicions turn out to be actual actions of bribery or not, will not suffer any form of negative action such as disciplinary action or any unfavourable action whatsoever.

### **Policy responsibility and monitoring:**

Direct responsibility for this policy and its monitoring and reporting lie with Imad Khanzada, ESG Operations Manager ([imadk@esolutionsgroup.co.uk](mailto:imadk@esolutionsgroup.co.uk)). All enquiries, comments and suggestions to be made to Imad Khanzada. All individuals are responsible for conforming to the policy and for its success.

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