

ANTI BRIBERY & BUS. ETHICS POLICY

STATEMENT OF INTENT



Ampsail Limited recognises that as it is continually placed in positions of trust by its clients and other parties, it has a responsibility to prevent and discourage bribery. With this in mind a clear policy detailing what the Company expects from all its employees has been put in place.

Bribery is an offer or receipt of any gift, loan, fee, reward or other advantage to or from any person as an inducement to do something that is dishonest, illegal or a breach of trust, in the conduct of the business.

The purpose of this policy is to set out the rules that must be adhered to by Ampsail Limited to prevent and discourage bribery.

Unacceptable behaviour

The following behaviour by employees and representatives of the Company is unacceptable and must not occur in the organisation,

- Accepting any inducement (financial or other reward) which results in a personal gain or advantage to the recipient or any person associated with them.
- Requesting an inducement (financial or other reward) from any person in return for providing some favour.
- Offering any inducement (financial or other reward) to any person in return for providing some favour.

Business Gifts

From time to time customers, suppliers or other persons might offer a gift to an employee. This could be a small gift or something of considerable value. Gifts (including discounted services) of excessive value, typically in excess of £50, should not be accepted by an employee or subcontractor acting on behalf of the Company, unless authorised by a Director. The Company may instruct an employee or representative to decline a gift, regardless of value, if in the opinion of Management, the acceptance of such a gift could compromise the integrity and reputation of the Company.

Notification of Gifts / Hospitality

From time to time customers or suppliers may invite an employee to a hospitality event. All such invitations must be reported to a Director. Permission must be given by a Director in advance in order for the employee to attend.

Inevitably, decisions as to what is acceptable may not always be easy. If anyone is in doubt as to whether a potential act constitutes bribery, the matter should be referred to a Director. Guidance can also be sought from HR.

Employee Responsibility

The prevention, detection and reporting of bribery is the responsibility of all employees throughout the Company. Any concerns in respect to suspicion of bribery should be raised with a Director or HR.

Company Responsibility

Instances of alleged bribery will be rigorously investigated by the Company who will assist the police and other appropriate authorities in any resultant prosecution.

Authorised by: _____

A handwritten signature in black ink, appearing to read 'Joe Gallagher', is written over a horizontal line.

Joe Gallagher – Managing Director

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