

# ANTI-BRIBERY POLICY & PROCEDURES

Transparency Policy Statement

---

## Document Control

Policy Owner	Risk Committee
Approving Body	Risk Committee
Date of Approval	16th March 2022
Version Number	1
Related Policies and procedures and guidelines	Anti-Money Laundering, Whistleblowing Policy, Modern Slavery Act Policy, Criminal Finance Act Policy
Reviewed by	NRJ March 2022 MSF 22 March 2024

# POLICY STATEMENT – ANTI-BRIBERY

---

Bribery is a criminal offence. We do not, and will not, pay bribes or offer improper inducements to anyone for any purpose, nor do we or will we, accept bribes or improper inducements.

To use a third party as a conduit to channel bribes to others is a criminal offence.

We do not, and will not, engage indirectly in or otherwise encourage bribery.

We are committed to the prevention, deterrence, and detection of bribery. We have zero-tolerance towards bribery. We aim to maintain anti-bribery compliance “business as usual” rather than as a one-off exercise.

## WHO DOES THIS POLICY APPLY TO?

---

This policy provides a coherent and consistent framework to enable our employees to understand and implement arrangements enabling compliance. In conjunction with related policies and key documents it will also enable employees to identify and effectively report a potential breach.

We require that all personnel, including those permanently employed, temporary agency staff and contractors:

- Act honestly and with integrity at all times and to safeguard the business resources for which they are responsible;
- Comply with the spirit, as well as the letter, of the law and regulations of all jurisdictions in which the business operates, in respect of the lawful and responsible conduct of activities.

## SCOPE OF THIS POLICY

---

This policy applies to all our activities. For partners, joint ventures, and suppliers, we will seek to promote the adoption of policies consistent with the principles set out in this policy.

Within the business, the responsibility to control the risk of bribery occurring resides at all levels of the organisation. It does not rest solely within assurance functions, but in all business units and corporate functions.

This policy covers all personnel, including all levels and grades, partners, those permanently employed, temporary agency staff, contractors, non-executives, agents, Members (including independent members), volunteers and consultants.

# THIS BUSINESS' COMMITMENT TO ACTION

---

This business commits to:

- Setting out a clear anti-bribery policy and keeping it up-to-date;
- Training all employees so that they can recognise and avoid the use of bribery by themselves and others;
- Encouraging its employees to be vigilant and to report to the Senior Management Team any suspicions of bribery, providing employees with suitable channels of communication and ensuring sensitive information is treated appropriately;
- Rigorously investigating instances of alleged bribery and assisting police and other appropriate authorities in any resultant prosecution;
- Taking firm and appropriate action against any individuals involved in bribery;
- Provide information to all employees to report breaches and suspected breaches of this policy;
- Include appropriate clauses in contracts to prevent bribery.

## BRIBERY

---

Is an inducement or reward offered, promised, or provided to gain personal, commercial, regulatory or contractual advantage.

### The Bribery Act

There are four key offences under the Act:

- Bribery of another person (Section 1)
- Accepting a bribe (Section 2)
- Bribing a foreign official (Section 6)
- Failing to prevent bribery (Section 7)

The [Bribery Act 2010](#) makes it an offence to offer, promise or give a bribe (Section 1). It also makes it an offence to request, agree to receive, or accept a bribe (Section 2). Section 6 of the Act creates a separate offence of bribing a foreign public official with the intention of obtaining or retaining business or an advantage in the conduct of business. There is also a corporate offence under Section 7 of failure by a commercial organisation to prevent bribery that is intended to obtain or retain business, or an advantage in the conduct of business, for our business. As a business we will have a defence to this corporate offence if it can show that we have in place adequate procedures designed to prevent bribery by or of persons associated with organisation.

## What are “adequate procedures”?

Whether the procedures are adequate will ultimately be a matter for the Courts to decide on a case-by-case basis. Adequate procedures need to be applied proportionately, based on the level of risk of bribery in the business. It is for us to determine proportionate procedures in the recommended areas of six principals. These principles are not prescriptive. They are intended to be flexible and outcome focussed, allowing for the different circumstances of the business.

## Proportionate procedures

Any procedures to prevent bribery by persons associated with it shall be proportionate to the bribery risks it faces and to the nature, scale and complexity of our activities.

## Top level commitment

The partners are committed to preventing bribery by persons associated with it. They foster a culture within the business in which bribery is never acceptable.

## Risk Assessment

The business under the responsibility of the Risk Committee ensures the business assesses the nature and extent of its exposure to potential external and internal risks of bribery on its behalf by persons associated with it. The assessment is periodic, informed and documented. It includes financial risks but also other risks such as reputational damage.

## Due diligence

The business applies due diligence procedures, taking a proportionate and risk-based approach, in respect of persons who perform or will perform services for or on behalf of the business, in order to mitigate identified bribery risks.

## Communication (including training)

The business seeks to ensure that its bribery prevention policies and procedures are embedded and understood throughout the business through internal and external communication, including training that is proportionate to the risks it faces.

## Monitoring and review

The business monitors and reviews procedures designed to prevent bribery by persons associated with it and makes improvements where necessary.

## Bribery is not tolerated

It is unacceptable 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 us in return;
- Retaliate against or threaten a person who has refused to commit a bribery offence or who has raised concerns under this policy; and
- Engage in activity in breach of this policy .

## Facilitation payments

Facilitation payments are not tolerated and are illegal. Facilitation payments are unofficial payments made to public officials in order to secure or expedite actions.

## Staff responsibilities

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for the business or under its control. All staff are required to avoid activity that breaches this policy.

You must:

- Ensure that you read, understand, and comply with this policy;
- Raise concerns as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future; and

As well as the possibility of civil and criminal prosecution, staff that breach this policy will face disciplinary action, which could result in dismissal for gross misconduct.

## Raising a concern

This business is committed to ensuring that all of us have a safe, reliable, and confidential way of reporting any suspicious activity. We want each and every member of staff to know how they can raise concerns.

We all have a responsibility to help detect, prevent and report instances of bribery. If you have a concern regarding a suspected instance of bribery or corruption, please speak up – your information and assistance will help. The sooner you act, the sooner it can be resolved.

There are multiple channels to help you raise concerns. Please refer to the Whistleblowing Policy and determine your favoured course of action. Preferably the disclosure will be made and resolved internally (e.g. to your head of department/on line reporting/telephone hotline). Secondly, where internal disclosure proves inappropriate, concerns can be raised with the SRA. Raising concerns in these ways may be more likely to be considered reasonable than making disclosure publicly (e.g. to the media).

Concerns can be anonymous. In the event that an incident of bribery, corruption, or wrongdoing is reported, we will act as soon as possible to evaluate the situation. We have clearly defined procedures for investigating fraud, misconduct and non-compliance issues, and these will be followed in any investigation of this kind. This is easier and quicker if concerns raised are not anonymous.

Staff who refuse to accept or offer a bribe, or those who raise concerns or report wrongdoing can understandably be worried about the repercussions. We aim to encourage openness and will support anyone who raises a genuine concern in good faith under this policy, even if they turn out to be mistaken.

We are committed to ensuring nobody suffers detrimental treatment through refusing to take part in bribery or corruption, or because of reporting a concern in good faith.

If you have any questions about these procedures, please contact our Money Laundering Reporting Officer.

### Other relevant policies:

- Criminal Finance Act Policy
- Anti-Money Laundering Policy
- Whistleblowing Policy

Approved: March 2022



**GLAISYERS**  
**ETL**  
GLOBAL

**Manchester Office:**  
3 Hardman Street  
Manchester M3 3HF  
**T:** 0161 832 4666

**Liverpool Office:**  
The Plaza  
100 Old Hall St  
Liverpool L3 9QJ  
**T:** 0151 332 3555

[hello@glaisyers.com](mailto:hello@glaisyers.com)  
[www.glaisyers.com](http://www.glaisyers.com)