



# Anti-Bribery Policy



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## Introduction

UK Mail is committed to adherence to the highest legal and ethical standards and values its reputation for ethical behaviour and financial integrity. This policy has been adopted by UK Mails Main Board and is available to all employees within the business to ensure commitment to it. The Board will apply a zero tolerance to acts of bribery and corruption by any employee or third party representative. Any breach of this policy will be regarded as a serious matter and is likely to result in disciplinary action.

Bribery exposure will be minimised through:

- Establishing a clear anti-bribery policy;
- Training employees and instructing all third party's so that they can recognise and avoid exposure to bribery by themselves and others;
- Encouraging its employees and third party's to be vigilant and to report any suspicion of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately;
- Rigorously investigating instances of alleged bribery and assisting the police and other appropriate authorities in any resultant prosecution;
- Taking firm and vigorous action against any individual(s) involved in bribery.

## Definition

Bribery is the accepting of gifts, money, hospitality or other favours in return for providing something of value to the briber. The purpose of this policy is to set out the rules that must be followed within UK Mail to ensure that no bribery occurs. This policy should be read in conjunction with the Ethical Guidelines outlined in the Employee Handbook.

## The Policy

**UK Mail prohibits:** the offering, the giving, the solicitation or the acceptance of any bribe, whether cash or other inducement

**to or from:** any person or company, wherever they are situated and whether they are a public official or body or private person or company

**by:** any individual employee, agent or other person or body acting on UK Mails behalf

**in order to:** gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual

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## Unacceptable behaviour

The following behaviour is unacceptable within UK Mail:

- Accepting any financial or other reward from any person in return for providing some favour;
- Requesting a financial or other reward from a person in return for providing some favour;
- Offering any financial or other reward to any person in return for providing some favour

## Further Clarification

**Business gifts:** e.g. wine, hampers, watches, chocolates, money from suppliers and/or customers; such gifts should not be accepted from a supplier and should be politely refused. If a gift is sent unsolicited it should be returned to the sender. If it cannot be returned the item must be properly declared by completing The Declaration of Gifts and Hospitality Form (available via Biznet) and sent to the Group Purchasing Manager. The item must then be raffled at the site and the funds donated to charity.

Business gifts of any sort should not be accepted during tender or contractual negotiations.

**Hospitality:** e.g. meals, theatre/music/sports events from suppliers and/or customers; modest reasonable and infrequent hospitality is an accepted courtesy of a business relationship however must be authorised in advance by your immediate Board Director.

- In all cases approved hospitality must be properly declared by completing The Receipt of Declaration of Gifts and Hospitality Form (available via Biznet) and sent to the Group Purchasing Manager before it is accepted.
- In accepting hospitality the recipient should not allow himself / herself to reach a position by which he / she may be deemed by others to have been influenced or his / her judgment or partiality has been affected when making a business decision because of accepting hospitality.
- All hospitality from suppliers or customer which would be considered over and above the usual course of business by a reasonable person (i.e. holidays, short breaks, overseas travel) or is disproportionate to the type of business dealing to which it relates, should be politely refused.
- Hospitality Gifts of any sort should not be accepted during tender or contractual negotiations.

Where it is not easy to decide what is and what is not acceptable, employees should consult the Purchasing Team for advice.

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## **Offering gifts and hospitality:**

Modest meals up to the value of £50 per head for up to 4 guests (which can include an additional UK Mail employee) can be offered but must be approved in advance by your immediate Board Director.

Business Gifts of any sort should not be given to a customer during tender or contract negotiations.

Approved UK Mail marketing gifts such as umbrella's, key rings or letter openers are not covered by this policy and can be given to customers.

## **Attempts to bribe**

Any employee who is concerned that he or she is potentially being bribed should report this matter to his or her head of department immediately.

## **Disciplinary action**

The policy will be audited to ensure the correct rules have been applied and any employee who has failed to comply with the policy will be subject to disciplinary action which could include dismissal for gross misconduct.

## **Contract termination**

Any contractor / agent found to have offered or accepted a bribe will face contract termination.

## **Raising concerns**

If an employee, contractor or agent is concerned that acts of bribery are occurring within UK Mail, then they should inform their head of department / primary contact manager in the first instance. Where this is considered inappropriate for whatever reason, then the confidential Crime Hotline should be utilised by calling 0800 0436 790 anytime.

## **Further improvements**

Should you have any suggestions for improvement of the Bribery Policy or connected prevention procedures or controls, these should be directed to your Line Manager/Head of Department. Alternatively, you may wish to use the confidential hotline for this purpose.