

Anti-Bribery & Corruption Policy

1 About this Policy

1.1 It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to corruption and bribery, and are committed to acting professionally, fairly, and with integrity in all our business dealings and relationships.

1.2 Any employee who breaches this policy will be subject to disciplinary action being taken, and in more serious cases where the intention has been to defraud Belmont Press, this will be treated as an act of gross misconduct rendering an employee liable to instant dismissal following Disciplinary Procedure PN6.

1.3 This Anti-Corruption and Bribery Policy does not form part of the terms and conditions of your contract with Belmont Press, and we reserve the right to amend it at any time.

1.4 This policy applies to all persons working for or on our behalf of Belmont Press in any capacity including directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.

2 Bribery

2.1 'Bribe' means any financial or other inducement or reward for action which is illegal, unethical, a breach of trust and/or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract and/or any other advantage or benefit.

2.2 'Bribery' includes offering, promising, giving, accepting and/or seeking a bribe.

2.3 All forms of bribery are strictly prohibited, and if you are unsure about whether a particular act constitutes bribery, you should speak to your Department Manager, or the HR Manager where necessary.

2.4 Specifically, you must never:

2.4.1 Give or offer any payment, gift, hospitality, and/or other benefit in the expectation that a business advantage will be received in return, or to reward any business that has already been received.

2.4.2 Accept any offer from a third-party that you know or suspect is made with the expectation that we will provide a business advantage for them or to anyone else.

2.4.3 Give or offer any payment (sometimes called a facilitation payment) to a government official in any country to facilitate or speed-up a routine and/or necessary procedure.

2.5 You must not threaten or retaliate against another person who has refused to offer or accept a bribe, or who has raised concerns about potential corruption and/or bribery.

3 Gifts and Hospitality

3.1 This policy does not prohibit the giving or accepting of reasonable and appropriate hospitality for legitimate purposes such as building relationships, maintaining our image or reputation, or the marketing of our products and/or services.

3.2 A gift or hospitality will not be considered appropriate if it is unduly lavish or extravagant, or could be seen as an inducement or reward for any preferential treatment during contractual negotiations and/or the tendering process.

3.3 Gifts must be of an appropriate type and value dependent upon the circumstances, and taking account of the reasons behind the gift. Gifts must not include cash or cash equivalents such as gift vouchers, or be given in secret. Gifts must be given in the name of Belmont Press, and not in your name.

3.4 Promotional gifts of low value such as branded stationery may be given to and/or accepted from clients, suppliers, and business partners.

4 Record-Keeping

4.1 You must declare and keep a written record of all hospitality or gifts given and/or received. You must also submit all expenses claims relating to hospitality, gifts, or payments to third parties, in accordance with our Expenses Policy.

4.2 All accounts, invoices, and other records relating to dealings with third parties, including clients and/or suppliers should be prepared with strict accuracy and completeness. Accounts must not be kept 'Off-Book' to facilitate or conceal improper payments.

5 How to Raise a Concern

5.1 If you are offered a bribe, are asked to make one, or if you suspect that corruption, bribery, or any other breach of this policy has, or may occur, you must notify your Department Manager and/or report it in accordance with our Whistleblowing Policy A.S.A.P.

Signed..........

Owen Thomas
Managing Director