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○ **JPP-HR-P-0009**
Anti Bribery Policy

○ Issue Number: 01 Issue
Date: 07.01.2022



Document Control			
Status:	Live	Date:	07.01.2022

Approval / Acceptance		
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Date:	Amended Date 06.01.2022	07.01.2022

Revision History					
This document should be reviewed at least every 12 months to maintain its effectiveness. Record the details of any changes made as a result of these reviews in the table below:					
Rev	Date:	Reason for Review:	Nature of Changes:	Prepared by:	Checked by:
:					



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- (a) offer, promise or give a financial or other advantage to another person (i.e. bribe a person), whether within the UK or abroad, with the intention of inducing or rewarding improper conduct
 - (b) request, agree to receive or accept a financial or other advantage (i.e. receive a bribe) for or in relation to improper conduct
 - (c) bribe a foreign public official.
- (3) You can be held personally liable for any such offence.
- (4) It is also an offence in the UK for an employee or an associated person to bribe another person in the course of doing business intending either to obtain or retain business, or to obtain or retain an advantage in the conduct of business, for the Company. The Company can be liable for this offence where it has failed to prevent such bribery by associated persons. As well as an unlimited fine, it could suffer substantial reputational damage.

4.0 POLICY STATEMENT

- (1) All employees and associated persons are required to:
- (a) comply with any anti-bribery and anti-corruption legislation that applies in any jurisdiction in any part of the world in which they might be expected to conduct business
 - (b) act honestly, responsibly and with integrity
 - (c) safeguard and uphold the Company's core values by operating in an ethical, professional and lawful manner at all times.
- (2) Bribery of any kind is strictly prohibited. Under no circumstances should any provision be made, money set aside or accounts created for the purposes of facilitating the payment or receipt of a bribe.
- (3) The Company recognises that industry practices may vary from country to country or from culture to culture. What is considered unacceptable in one place may be normal or usual practice in another. Nevertheless, a strict adherence to the guidelines set out in this Policy is expected of all employees and associated persons at all times. If in doubt as to what might amount to bribery or what might constitute a breach of this Policy, refer the matter to your line manager or to the Company's HR Department.
- (4) For the Company's rules and procedures in relation to the receipt of business gifts from third parties and corporate hospitality offered to or received from third parties, please refer to the Company's Gifts from Clients/Suppliers Policy. They form part of the Company's zero tolerance policy towards bribery and they should be read in conjunction with this Policy.
- (5) The giving of business gifts to clients, customers, contractors and suppliers is not prohibited provided the following requirements are met:



- (a) the gift 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
 - (b) it is given in the Company's name, not in the giver's personal name
 - (c) it does not include cash or a cash equivalent (such as gift vouchers)
 - (d) it is of an appropriate and reasonable type and value and given at an appropriate time
 - (e) it is given openly, not secretly
 - (f) it is approved in advance by a director of the Company.
 - (g) it complies with local laws
- (6) In summary, it is not acceptable 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 accept a payment, gift or hospitality from a third party that you know or suspect is offered or provided with the expectation that it will obtain a business advantage for them.
- (7) Any payment or gift to a public official or other person to secure or accelerate the prompt or proper performance of a routine government procedure or process, otherwise known as a "facilitation payment", is also strictly prohibited. Facilitation payments are not commonly paid in the UK but they are common in some other jurisdictions.

5.0 RESPONSIBILITIES AND REPORTING PROCEDURE

- (1) It is the contractual duty and responsibility of all employees and associated persons to take whatever reasonable steps are necessary to ensure compliance with this Policy and to prevent, detect and report any suspected bribery or corruption in accordance with the procedure set out in the Company's Disclosures in the Public Interest Policy. You must immediately disclose to the Company any knowledge or suspicion you may have that you, or any other employee or associated person, has plans to offer, promise or give a bribe or to request, agree to receive or accept a bribe in connection with the business of the Company. For the avoidance of doubt, this includes reporting your own wrongdoing. The duty to prevent, detect and report any incident of bribery and any potential risks rests not only with the directors of the Company but equally to all employees and associated persons.

- (2) The Company encourages all employees and associated persons to be vigilant and to report any unlawful conduct, suspicions or concerns promptly and without undue delay so that investigation may proceed and any action can be taken expeditiously. In the event that you wish to report an instance or suspected instance of bribery, you should follow the steps set out in the Company's Disclosures in the Public Interest Policy. Confidentiality will be maintained during the investigation to the extent that this is practical and appropriate in the circumstances. The Company is committed to taking appropriate action against bribery and corruption. This could include either reporting the matter to an appropriate external government department, regulatory agency or the police and/or taking internal disciplinary action against relevant employees and/or terminating contracts with associated persons.
- (3) The Company will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. It is also committed to ensuring nobody suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or corruption offence has taken place or may take place in the future.

6.0 RECORD KEEPING

- (1) All accounts, receipts, invoices and other documents and records relating to dealings with third parties must be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off the record" to facilitate or conceal improper payments.

7.0 SANCTIONS FOR BREACH

- (1) A breach of any of the provisions of this Policy will constitute a disciplinary offence and will be dealt with in accordance with the Company's disciplinary procedure. Depending on the gravity of the offence, it may be treated as gross misconduct and could render the employee liable to summary dismissal.
- (2) As far as associated persons are concerned, a breach of this Policy could lead to the suspension or termination of any relevant contract, sub-contract or other agreement.

8.0 MONITORING COMPLIANCE

- (1) The Company's HR Department has lead responsibility for ensuring compliance with this Policy and will review its contents on a regular basis. They will be responsible for monitoring its effectiveness and will provide regular reports in this regard to the directors of the Company who have overall responsibility for ensuring this Policy complies with the Company's legal and ethical obligations.

9.0 TRAINING

- (1) The Company will provide training to all employees to help them understand their duties and responsibilities under this Policy. The Company's zero tolerance approach to bribery will also be communicated to all business partners at the outset of the business relationship with them and as appropriate thereafter.