

## 1.1.1 ANTI BRIBERY & CORRUPTION POLICY

### 1.1.1.1 Purpose

The purpose of this document is to set out the firm's policy in relation to bribery and corruption. The policy applies strictly to all employees, directors, agents, consultants, contractors and to any other people or bodies associated with **Edocuments Ltd**.

### 1.1.1.2 Understanding and recognising bribery and Corruption

Acts of bribery or corruption are designed to influence an individual in the performance of their duty and incline them to act in a way that a reasonable person would consider to be dishonest in the circumstances.

Bribery can be defined as offering, promising or giving a financial (or other) advantage to another person with the intention of inducing or rewarding that person to act or for having acted in a way which a reasonable person would consider improper in the circumstances. Corruption is any form of abuse of entrusted power for private gain and may include, but is not limited to, bribery.

Bribes are not always a matter of handing over cash. Gifts, hospitality and entertainment can be bribes if they are intended to influence a decision.

### 1.1.1.3 Policy Statement

Edocuments Ltd will not tolerate bribery or corruption in any form.

The firm prohibits the offering, giving, solicitation or the acceptance of any bribe or corrupt inducement, whether in cash or in any other form:

- to or from any person or company wherever located, whether a public official or public body, or a private person or company;
- by any individual employee, director, agent, consultant, contractor or other person or body acting on the firm's behalf;
- in order to gain any commercial, contractual, or regulatory advantage for the firm in any way which is unethical or to gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.

This policy is not intended to prohibit normal hospitality practices provided they are appropriate, proportionate and are properly recorded.

It may not always be a simple matter to determine whether a possible course of action is appropriate. If you are in any doubt as to whether a possible act might be in breach of this policy or the law, the matter should be referred to a Director.

The firm will investigate thoroughly any actual or suspected breach of this policy, or the spirit of this policy. Employees found to be in breach of this policy may be subject to disciplinary action which may ultimately result in their dismissal.

#### **1.1.1.3.1 Key risk areas**

Excessive gifts, entertainment and hospitality: can be used to exert improper influence on decision makers.

Facilitation payments: are used by businesses or individuals to secure or expedite the performance of a routine or necessary action to which the payer has an entitlement as of right. The firm will not tolerate or excuse such payments being made.

Reciprocal agreements: or any other form of 'quid pro quo' are never acceptable unless they are legitimate business arrangements which are properly documented and approved by management. Improper payments to obtain new business, retain existing business or secure any improper advantage should never be accepted or made.

Actions by third parties for which the firm may be held responsible: can include a range of people i.e. agents, contractors and consultants, acting on the firm's behalf. Appropriate due diligence should be undertaken before a third party is engaged. Third parties should only be engaged where there is a clear business rationale for doing so, with an appropriate contract. Any payments to third parties should be properly authorised and recorded.

#### **1.1.1.3.2 Employee responsibility and how to raise a concern**

The prevention, detection and reporting of bribery or corruption is the responsibility of all employees throughout the firm. If you become aware or suspect that an activity or conduct which is proposed or has taken place is a bribe or corrupt, then you have a duty to report this.

#### **1.1.1.4 Policy Maintenance**

Supporting standards, guidelines and procedures will be issued on an on-going basis by Edocuments. Users will be informed of any subsequent changes or updated versions of such standards, guidelines and procedures by way of e-mail or other relevant means of communication. Users shall then have the obligation to read the current information systems policies from the Springboard System or other relevant communication media on an on-going basis and accept the terms and conditions contained therein.

#### **1.1.1.5 Deviations from Policy**

Unless specifically approved, any deviation from this policy is strictly prohibited. Any deviation to or non-compliance with this policy shall be reported to the BMS Manager / Operations Director / Applications Director as appropriate.