

	Reference Number:	HRPolicy- Anti-Bribery Policy			Anti Bribery Policy
	Version Number:	01	Effective Date:	29/04/2016	

# Anti-Bribery Policy

## 1. Purpose

The purpose of this policy is to state Toppesfield's position on bribery and to provide guidance on how to recognise and deal with bribery issues. All employees and associated persons are required to familiarise themselves and comply with this policy.

## 2. Scope

This policy shall apply to all individuals working at all levels, including consultants, subcontractors, employees (whether permanent, fixed-term or temporary), contractors, trainees, seconded staff, homeworkers, casual workers and volunteers or any other individual associated with us.

Our company is committed to maintaining the highest ethical standards and vigorously enforces the integrity of its business practices wherever it operates throughout the world.

## 3. Bribery

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

### Gifts & Hospitality

This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties and the giving or receipt of gifts, provided that the following is followed:-

- it complies with local law
- it is given in the Toppesfield name and not the individual
- it is appropriate in the circumstances – (i.e. Christmas appreciation gifts)
- it does not include cash or a cash equivalent (such as gift certificates or vouchers);
- it is given openly, not secretly
- taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time

If you receive a gift on behalf of Toppesfield or a company has contacted you to arrange entertainment or any other item that can be deemed as a gift under this policy, it must be declared and approved by a Board member. If you find yourself in an awkward situation or are not sure how to respond to if an offer of a gift is made to you, which could contravene this policy then please seek guidance from your line manager or the HR department.

A gifts and hospitality register will be emailed to all management for completion items to include:-

- Cost of the entertainment
- Names of individuals
- Company name
- Received or Given
- Reason for the gift or entertainment

### Charitable Donations

The Company only makes charitable donations that are legal and ethical under local laws and practices. A charitable donation can form part of our wider commitment and responsibility to the community in which we are based or undertaking projects in. No donation must be offered or made without the prior approval of the Finance Director or Managing Director.

### Facilitation Payments

Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. Facilitation payments are not tolerated and are illegal.

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#### 4. Our Stance on Bribery

Toppesfield does not tolerate any form of bribery and is committed to carrying out business fairly, honestly and openly and at all times, within the law. 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.

Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter. All employees and those who are acting for or on behalf of Toppesfield have an obligation to notify third parties of this policy at the start of any business relationship.

#### 5. Training

Toppesfield will provide regular, relevant training to all employees to help them understand their duties and responsibilities under this Policy. Training on this policy also forms part of the induction process for all new workers.

#### 6. Reporting

Toppesfield encourages all employees and associated persons to be vigilant and to report any unlawful conduct, suspicions or concerns to a member of management, promptly and without undue delay so that investigation may proceed and any action can be taken expeditiously. Toppesfield will support anyone who raises genuine concerns in good faith under this Policy.

#### 7. Reviewing Policy

This policy will be reviewed and, if necessary, revised in the light of legislative or codes of practice and organisational changes. Workers are invited to comment on this policy and suggest ways in which it might be improved, employees should also ensure they use it to disclose any suspected wrongdoing.

#### 8. Prevention

To address these risks we have taken the following steps:

- Implemented an anti-bribery policy
- Reviewed and amended policies related to this Anti-Bribery Policy
- Prepared standard clauses relating to Bribery Act issues for inclusion in key contractual documentation.
- Undertaken a refresher training for all existing employees
- Bribery training at induction for new employees
- Multiple staff sign off on Sales Order
- Strict purchase invoice/expense approval controls

#### 9. Detection

Where possible, continuous monitoring methods are used to enable bribery to be identified rapidly and escalated to the appropriate management levels, and swift corrective action taken to reduce the impact of such incidents.

#### 10. Consequences

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. This may also leave you open to a criminal prosecution under the Act. An offence under the Act can result in a fine and/or up to a maximum of 10 years imprisonment.

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.

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## 11. Who is responsible?

The Toppesfield Board of directors has approved and issued this policy as part of its overall responsibility for ensuring Toppesfield complies with its legal and ethical obligations, and the associated people comply with it.



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Matthew Pryor  
Managing Director  
29<sup>th</sup> April 2016