

# **Anti-Bribery & Corruption Policy**

**October 2023**



## Contents

Introduction .....	3
Policy .....	3
Company Responsibility .....	3
What is a Bribe .....	4
Employee Responsibility .....	4
Non-Compliance .....	4
Implementation of the Policy .....	4

## Introduction

Ecofficiency is committed to implementing and enforcing effective systems to counter bribery. Therefore, it is the Company's policy to conduct all aspects of its business in an honest and ethical manner at all times.

Under UK law (UK Bribery Act 2010), bribery and corruption is punishable for individuals by up to ten years imprisonment. If the Company is found to have taken part in the corruption or lacks adequate procedures to prevent Bribery, it could face an unlimited fine and be excluded from tendering for Government contracts.

*'Bribery is the offer, promise, giving, demanding or acceptance of anything of value to or from another person as an inducement or reward for an action which is illegal, dishonest, unethical or a breach of trust'*

*'Corruption is the misuse of public or private office or power for personal gain'*

## Policy

The aim of this policy is to help the Company act in accordance with the Bribery Act 2010, maintain the highest possible standards of business practice, and advise individuals of the Company's 'zero-tolerance' to acts of bribery and corruption.

This policy applies to all permanent and fixed-term staff employed by the Company, and any contractors, consultants or other persons acting under or on behalf of the Company.

### The Company will not:

- Make contributions of any kind with the purpose of gaining any commercial advantage.
- Provide gifts or hospitality with the intention of persuading anyone to act improperly, or to influence a public official in the performance of their duties.
- Make, or accept, "kickbacks" of any kind.
- Make political donations

## Company Responsibility

### The Company will:

- Keep appropriate internal records that will evidence the business reason for making any payments to third parties.
- Encourage employees to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. All concerns raised will be dealt with in confidence.
- See that anyone raising a concern about bribery will not suffer any detriment as a result, even if they turn out to be mistaken.

Ecofficiency do not prohibit the giving or accepting of reasonable and appropriate gifts, entertainment and hospitality for legitimate purposes such as building relationships, or marketing our products and services. This could include receipt or offer of gifts, meals, invitations to events, functions or social gatherings in connection to our business. These activities are acceptable provided they are within acceptable levels of value and occurrence.

## What is a Bribe

A bribe can be in the form of cash, gift cards / vouchers, loans or credit, gifts, event tickets, the award of a contract, charitable contributions, employment or even a work experience placement. It can be active or passive.

*Active Bribery* is where a person may seek to corrupt another by giving or attempting to make a bribe

*Passive Bribery* is where a person may act in a corrupt manner by seeking, agreeing to accept, or by accepting a bribe.

## Employee Responsibility

Employees must not:

- Accept any financial or other reward from any person in return for providing some favour
- Request a financial or other reward from any person in return for providing some favour
- Offer any financial or other reward from any person in return for providing some favour

## Non-Compliance

All employees have a role to play in enforcing the policy and are required to deal with any observed or reported breaches. Should employees feel apprehensive about their own safety in regard to addressing any breach, they should seek senior management support.

Failure to comply with this policy may lead to a conflict within the individual's job role, may lead to non-compliance with legislation or may lower the expected standards of performance, resulting in reduced effectiveness or efficiency, underperformance and putting service delivery at risk.

Any member of staff refusing to observe the policy will be liable to disciplinary action in accordance with the Company's Disciplinary Policy up to and including dismissal.

## Implementation of the Policy

Overall responsibility for policy implementation and review rests with the Company senior management. However, all employees are required to adhere to and support the implementation of the policy.

The Company will inform all existing employees about this policy and their role in the implementation of the policy. They will also give all new employees notice of the policy on induction to the Company.

This policy will be implemented through the development and maintenance of procedures for appraisals and one-to-one meetings, using template forms, and guidance given to both managers and employees on the process.



Document Reference:  
Ecofficiency Anti-Bribery & Corruption Policy 2023

Revision  
No: 1

Revision Date:  
01/10/23 10:16:00

Uncontrolled Document when  
Downloaded or Printed

Page: 4

Signed:

Managing Director

July 2022



---

Document Reference:  
Ecofficiency Anti-Bribery & Corruption Policy 2023

Revision  
No: 1

Revision Date:  
01/10/23 10:16:00

Uncontrolled Document when  
Downloaded or Printed

Page: 5