



INTEGRATED QUALITY, ENVIRONMENTAL & SAFETY PROCEDURE (iQESP)

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1. INTRODUCTION

The Bribery Act 2010 (the “Bribery Act”) was enacted by the UK Parliament on 8th April 2010 and came into force on 1st July 2011.

Senior management commitment is given to ensure we conduct our business without bribery.

The intention of this policy is to set out rules and guidance for all staff to follow to ensure that the Company can demonstrate at all times that we have acted in accordance with our values and behaviours in our dealings with our clients, suppliers and business partners. All employees need to be especially transparent in their dealings with clients and suppliers.

Bona fide hospitality and promotional, or other business expenditure which seeks to improve the image of a commercial organisation, better to present products and services or establish cordial relations is recognised as an established and important part of doing business. At Hornbill Engineering we recognise that giving and accepting gifts and invitations to hospitality events is an important part of building normal business relationships.

2. PROCEDURE

In general, no employee should use their authority or office for personal gain and shall seek to uphold and enhance the standing of the Company by maintaining an unimpeachable standard of honesty, impartiality and integrity in all their business relationships.

Any offer of a bribe or commission made by an external organisation, or anyone else dealing with the Company, must be reported at once to your immediate manager. At Hornbill Engineering bribery will not be accepted in any form.

Each employee has a personal responsibility to ensure that a record is maintained for all offers of gifts or hospitality whether the offer is accepted or not. Employees must inform their immediate manager. The policy also covers using a Hornbill Engineering supplier to undertake services unrelated to employment (e.g. electrical, building work at home, etc).

The Personnel Coordinator shall maintain a Register of Services, Gifts and Hospitality and shall make it available for inspection as required. The Register shall be provided for inspection by the Managing Director annually as in certain instances reference may need to be declared within our statutory accounts.

Any employee who becomes aware of a breach of this Policy should report this immediately to their manager.

The acceptance and/or offer of small gifts such as flowers are acceptable within reasonable bounds, as long as it is a normal and appropriate expression of business courtesy.

Gifts should not be accepted where they may appear to be disproportionately generous or could reasonably be construed as an inducement to affect a business decision. Occasionally,

a supplier may offer a discount on services or products purchased by Company employees. Such discounts should only be accepted when they are generally available to all employees.

It is understood that there are times when meals, beverages, golf outings, tickets to sporting or cultural events, and other social occasions are proper and acceptable and helpful in conducting business. Entertainment of this nature, however, is not to be used as a prerequisite for doing business with this company.

The following list provides some guidance on what is likely to be high / low risk of being viewed as a potential bribe.

LOW RISK	HIGH RISK
Taking business contacts out for lunch and dinner, accompanied by you	Paying for lunch and dinner for business contacts unaccompanied by you
Provision of flights, taxis or other transport services to facilitate a meeting or on site visit	Provision of flights, taxis or other transport services to facilitate non-business related activities, such as paying for 5 star holidays
Tickets to sports or other cultural events, accompanied by you	Tickets to sports or other cultural events, unaccompanied by you
Taking business contacts on a golf day with members of your organisation	Flying business contacts unaccompanied overseas for a golf holiday
Gifts such as corporate pens, calendars etc	Lavish gifts such as expensive watches, or even cars

In all cases a record should be maintained of all services, gifts and hospitality and services offered or received from suppliers in the format provided. All staff should be transparent in their dealings, especially directors and senior staff. If in any doubt please see your immediate manager.

How will we monitor this policy?

Hornbill will:-

- Monitor performance against the policy through internal audits.
- Train and support staff in understanding the requirements.

Communication Process

Hornbill will:-

- Listen to its customers' and clients'.
- Be professional and accurate with all information provided to our customers' and clients'.

REVISION INDEX

DATE	ISSUE	SUMMARY OF CHANGE
21/07/2017	1	Issued after consultation.