



Anti-Corruption and Anti-Bribery Policy

Document Control

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1. Purpose

The Networking People (Northwest) Limited (TNP) has zero tolerance of bribery and corruption. TNP values its reputation and is committed to maintaining the highest level of ethical standards in the conduct of its business affairs. The actions and conduct of TNP's staff as well as others acting on our behalf are key to maintaining these standards.

The purpose of this document is to:

- Set out TNP's policy in relation to bribery and corruption
- Provide guidance for staff to ensure an open and honest process for declaring and registering any conflicts of interest whilst working for TNP
- Aims to protect TNP as a company as under UK legislation it is illegal to offer, promise, give, request, agree, receive or accept bribes

2. Scope

This policy applies to all TNP employees and to those acting on TNP's behalf. All third parties doing business with TNP or acting on our behalf must follow this policy and put in place procedures to prevent and detect bribery and corruption.

3. Exceptions

This policy is not intended to prohibit the following practices provided they are appropriate, proportionate and are properly recorded:

- normal hospitality;
- fast tracking a process which is available to all on the payment of a fee; and/or
- providing resources to assist a person or body to make a decision more efficiently, provided that it is for this purpose only

4. Review

This policy will be monitored and reviewed regularly. It may be amended from time to time. If employees have concerns about this policy they can be raised with their line manager.

5. Procedures

5.1 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.

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

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.

Bribery can be a risk in many areas, key areas to be aware of are:

- Excessive gifts, entertainment and hospitality – these 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, TNP will not tolerate or excuse such payments being made
- Reciprocal agreements – these agreements 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 TNP may be held responsible – this could include a range of people acting on TNP'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.
- Record keeping – this can be exploited to conceal bribes or corrupt practices

To protect against bribery do not make payments in cash, bonds, securities or anything similar. Always make payments by bank transfer or cheque to a bank account which is in the name of the organisation and which is in the country where they provide services to TNP.

Take particular care if any of the instances below are apparent during your work for TNP and seek guidance from your line manager if you are unclear how to proceed.

- Contact with close family, personal or business ties that a third party or partner has with government officials
- A request for a cash payment
- Requests for work to be commissioned substantially above the normal rate
- Unusual payment arrangements (such as payments to be made to another country or to a third party)
- Requests to pay expenses which are unusual or vague
- Invoices which are too high or non-standard
- Where a third party refuses to agree to take action where a payment is corrupt

5.2 Conflicts of interest

A conflict of interest is any situation where your loyalties might appear to be at odds with your duties to TNP.

You are expected to act at all times in TNP's best interests and to exercise sound judgement unclouded by private interests or divided loyalties. You should avoid situations where you, or TNP, could be open to suspicion of dishonesty, favouritism or lack of transparency. If you can't avoid a situation you should declare this to your line manager, it is your responsibility to register any potential or actual conflicts of interest with your manager.

Examples of **actual** conflict situations which should be avoided or resolved are set out below (this is not an exhaustive list):

Conflict Type	Examples
Outside employment	<ul style="list-style-type: none"> • Any outside business activity that detracts from your ability to devote appropriate time and attention to your responsibilities within TNP

	<ul style="list-style-type: none"> Any outside business activity with a company which is a supplier to TNP or is in competition with TNP
Family/friend interests	<ul style="list-style-type: none"> Recruiting or managing a relative or partner
Material financial interest	<ul style="list-style-type: none"> Recruiting an individual due to their political connections which you intend to leverage for TNP's benefit A personal interest in a supplier, customer or competitor which influences your decisions at work

The following are examples of **potential** conflicts of interest, which are situations that require you to agree a way of ensuring the conflict does not materialise (mitigation) and register the interest (this is not an exhaustive list):

Conflict Type	Examples
Outside employment	<ul style="list-style-type: none"> Being a Director of another company or organisation Other employment to your TNP role
Family/friend interests	<ul style="list-style-type: none"> A close relationship with a senior manager of a competitor or supplier Working in the same department as your partner or close relative
Material financial interest	<ul style="list-style-type: none"> Having a material shareholding in a competitor or supplier of TNP Involvement in managing a supplier relationship with a company in which a close relative or partner has a financial or business involvement

5.3 Gifts and hospitality

This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties.

Normal and appropriate hospitality and gifts would include where the hospitality or 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, or in explicit or implicit exchange for favours or benefits;
- Complies with local law;
- Is given in the company name, not an individual's name;
- Does not include cash or a cash equivalent (e.g. gift certificates/vouchers);
- Is appropriate in the circumstances, e.g. small gifts given at Christmas;
- Taking into account the reason for the gift, is of an appropriate type and value and given at any appropriate time;
- Is given openly, not secretly; and
- Is not offered to, or accepted from, government officials or representatives, or politicians or political parties, without the prior approval of the Board of Directors.

Do not offer or accept gifts, payment or hospitality to encourage or reward a decision.

5.4 Charitable donations and sponsorship

You must not use charitable donations or sponsorship as a way of concealing a bribe. Any charitable donations and sponsorship should reflect TNP's commitment to corporate responsibility and ethical business.

5.5 Responsibilities of members of staff

All staff will be required to follow the company's written procedures.

The prevention, detection and reporting of bribery or corruption is the responsibility of all employees. 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.

Managers have responsibility to ensure that each member of their team has access to this policy and has access to any guidance and training required to understand and follow the policy.

5.6 Reporting concerns

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are approached and asked to pay a bribe, or are offered a bribe, or you think another TNP employee or third party may be involved in any corrupt behaviour, then report this to your line manager.

Protection

Workers who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. If another employee tries to deter you from reporting your concerns this is a disciplinary offence and will be dealt with as such.

5.7 Breaches of this policy

Breaches of this policy can result in TNP taking disciplinary action and could lead to dismissal in serious cases. TNP will investigate any actual or suspected breach of this policy and if deemed necessary will refer to the police for criminal investigation.

The Law

The Bribery Act 2010 came into force on 1st July 2011, under the Act bribery by individuals is punishable by up to ten years' imprisonment and/or an unlimited fine. If a company is found to have taken part in the bribery or is found to lack adequate procedures to prevent bribery, it too could face an unlimited fine.