

Standard Operating Procedures Manual

Section 01 – Company Information ETHICS

01.10 Anti-bribery & Corruption Statement

Created 19 April 2017

Last review October 2021

POLICY STATEMENT

1.0 The purpose of this policy is to clearly state our position with regard to bribery & corruption in the workplace.

1. It is the policy of Interface Environment Management Ltd to conduct business in an honest and ethical manner. As part of Policy, Interface EM has a zero-tolerance approach to bribery and corruption. Interface EM will at all times act with integrity professionalism and fairness in all its business dealings and relationship and will not tolerate any form of bribery in line with the Bribery Act 2010 (the **Act**), which applies to conduct both in the UK and abroad.
2. Interface EM pledges by this policy to uphold all laws relevant to countering bribery and corruption in all areas in which it conducts business
3. This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.
4. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. Any non-employee who breaches this policy may have their contract terminated with immediate effect.
5. This policy does not form part of any employee's contract of employment and we may amend it at any time. It will be reviewed regularly.

2.0 What is bribery?

- a) Bribe means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit.
- b) Bribery includes offering, promising, giving, accepting or seeking a bribe.
- c) You must not threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.

3.0 All forms of bribery are strictly prohibited.

If you are unsure about whether a particular act constitutes bribery, raise it with your line manager or Director.

4.0 Specifically, you must not:

- a) give or offer any payment, gift, hospitality or other benefit in the expectation that a business advantage will be received in return, or to reward any business received
- b) accept any offer from a third party that you know or suspect is made with the expectation that we will provide a business advantage for them or anyone else;
- c) give or offer any payment (sometimes called a facilitation payment) to a government official in any country to facilitate or speed up a routine or necessary procedure;

5.0 Gifts and hospitality

This policy does not prohibit normal and appropriate gifts and hospitality (given and received) to or from Third Parties (eg. . a Christmas gift), however such gifts must be given or received with the following strictures:

- a) must comply with UK law
- b) must be given in the name of the organisation, not an individual's name
- c) must not include cash
- d) must be appropriate to the circumstances
- e) must be of an appropriate type and value
- f) must be given at an appropriate time taking into account the reason for the gift
- g) must be given openly, not surreptitiously
- h) must be recorded

6.0 Is it Appropriate ?

- a) This policy does not prohibit the giving or accepting of reasonable and appropriate hospitality for legitimate purposes such as building relationships, maintaining our image or reputation, or marketing our products and services.
- b) A gift or hospitality will not be appropriate if it is unduly lavish or extravagant, or could be seen as an inducement or reward for any preferential treatment (for example, during contractual negotiations or a tender process).

Standard Operating Procedures Manual
Section 01 – Company Information ETHICS
01.10 Anti-bribery & Corruption Statement

- c) Gifts must be of an appropriate type and value depending on the circumstances and taking account of the reason for the gift.
- d) Gifts must not include cash or cash equivalent (such as vouchers), or be given in secret.
- e) Gifts must be given in our name, not your name.
- f) Promotional gifts of low value such as branded stationery may be given to or accepted from existing customers, suppliers and business partners.

6.0 Record keeping

- a) Appropriate records and internal controls are in place to record the business reason for any gifts, the type of gift, the value of the gift and contact details of giver or recipient.

7.0 Responsibilities and Reporting

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. All directors and employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You are required to notify Interface EM as soon as possible if it is believed or suspected that a conflict with this policy has occurred, or may occur in the future, or if you are offered a bribe, are asked to make one.

Any employee found to be in breach of this policy will face disciplinary action, which may result in instant dismissal under the terms of Gross Misconduct

Monitoring and review

In line with all our Policies and Standard Operating Procedures this policy will be reviewed annually to ensure its effectiveness; if in the interim period of reviews any improvements are identified updates will take place at the time of identifying such improvement.



Gordon Abrahams Operations Director

Reviewed October 2021