

## **Anti-Corruption & Bribery Statement**

### **Purpose and scope**

This policy sets out our ethical business practices. It applies to all employees, in relation to our dealings with our people, agents, clients, suppliers, subcontractors, competitors.

### **Policy objectives**

We have a duty to act responsibly and to show the highest levels of ethical and moral stewardship. The objectives of this policy are to:

- Support our commitment to be a responsible business and develop mutually beneficial and sustainable relationships
- with our stakeholders, based on trust and co-operation;
- Treat all our stakeholders appropriately; and
- Promote safe and fair working conditions, including the responsible management of environmental and social issues

### **Requirements**

Zero tolerance to bribery and corruption: Bribery and corruption will not be tolerated. It is not acceptable to:

- Give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage
- will be received, or to reward a business advantage already given, or to facilitate or expedite a routine procedure;
- Request, agree to receive or accept payment from a third party that is known or suspected to have been offered with the expectation that it will obtain a business advantage from UKPSS
- Participate in any activity that might lead to or suggest that a facilitation payment or kickback has been made or accepted by UKPSS;
- Accept a gift or hospitality from a third party if it is known or suspected to have been offered or provided with an expectation that it will obtain a business advantage from UKPSS; or
- Threaten or retaliate against another employee who has refused to commit a bribery offence or who has raised concerns under this policy.

Any acts of bribery and other forms of corruption, and failure by any employee to report such acts when they reasonably suspect or know another employee has committed them, will be treated as gross misconduct, and may result in summary dismissal.

Zero tolerance to tax evasion and the facilitation of tax evasion: Tax evasion and facilitation of tax evasion will not be tolerated, this refers to all taxes including social security, Tax evasion is the offence of cheating the public revenue of any territory of any taxes due. The facilitation of tax evasion is aiding, abetting, counselling, or procuring the commission of a tax evasion offence or knowingly being party to such activity. It

is not acceptable to:

- Participate in any activity that may be regarded as tax evasion or the facilitation of tax evasion;



- Agree to enter into any arrangement with employees, customers, suppliers, or contractors that may lead to the diversion of any tax away from relevant authorities;
- Assist any individuals in any of the above activities. You have a responsibility to raise any concerns you may have, which can be done in accordance with the Whistleblowing procedure.

Zero tolerance to fraud: All employees, subcontractors, agents, and suppliers must act honestly and with integrity at all times. No accounts must be kept “off the book” to facilitate or conceal improper payments.

#### **Expenses and entertainment:**

Business practices and ethical conduct: We will comply with all international sanctions regimes and will not provide services and/or resources to those subject to sanctions.

Client confidentiality and information related to data protection legislation must be safeguarded. Conflicts of interest must be declared. Anti-competitive practices will not be tolerated. We never make donations to political organisations and only make charitable donations that are legal and ethical under local laws and practices.

#### **Human rights and labour standards:**

Over and above the requirements of the Modern Slavery Act, we endorse the tenets of the Global Compact principles, International Labour Organisation Declaration on Fundamental Principles and Rights at Work and the Ethical Trading Initiative ‘Base Code’ and will ensure that: employment is freely chosen; freedom of association is respected; working conditions are safe and hygienic; child labour shall not be used; wages are not lower than minimum wage; working hours are not excessive; no discrimination is practised; regular employment is provided; and no harsh or inhumane treatment is allowed. Compliance with these rules is a prerequisite for any business engagement.