



# BRIBERY POLICY

**This policy applies to the Director and associated persons of EDGEdesign Ltd.**

## **1 Policy Statement**

- 1.1 EDGEdesign Ltd conduct their business to the highest standards of integrity and without bribery.
- 1.2 This policy outlines EDGEdesign Ltd's position on preventing and prohibiting bribery in accordance with the Bribery Act 2010 setting out measures to prevent, monitor and eliminate bribery.
- 1.3 EDGEdesign Ltd will not tolerate any form of bribery by or of its Director or associated persons which include agents, consultants or any person or body acting on its behalf.
- 1.4 The procedures set out in this policy apply equally to third party hospitality and gift giving and receipt within the context of the business and/or business relationships.

## **2 Responsibilities**

- 2.1 Associated persons whilst representing EDGEdesign Ltd are responsible for:
  - Ensuring prior approval is gained from the Director of EDGEdesign Ltd before offering or accepting any hospitality and in all cases notifying the Director if an offer of hospitality accepted or not taken up.
  - Ensuring no gifts (with the exception of marketing merchandise approved by the Director of EDGEdesign Ltd) are offered.
  - Resisting the acceptance of gifts.
  - Ensuring any gifts accepted are declared in the appropriate manner are made available for random distribution amongst the Director and relevant associated persons.
  - Associated persons will be held accountable for their actions in relation to the acceptance or offering of gifts and/or hospitality.



## 2.2 The Director is responsible for:

- Deciding whether or not appropriate hospitality should be offered to third parties.
- Deciding whether or not the Company or an associated person may accept hospitality.
- Retaining a record of all hospitality both offered to and accepted by the Company and associated persons.
- Retaining a record of all hospitality offered to and accepted by third parties.
- Retaining a record of all gifts both offered to and accepted by the Company and associated persons over the value of £25 (including VAT).
- Ensuring all accepted gifts are distributed randomly amongst the Director and relevant associated persons.
- Ensuring that retained records are made available to the Director of EDGEdesign Ltd from relevant associated persons upon request.

## 3 **Bribery Act 2010**

3.1 The Bribery Act 2010 came into force on 19 July 2011 and sets out the UK approach to addressing the issue of bribery and corruption in commercial and public life.

3.2 The Act creates three main criminal offences in relation to bribery. An individual may commit an offence by:

- Bribing a person to induce them or reward them to perform a 'relevant function' improperly e.g. making a gift to a public official in order to secure a contract.
- Requesting, accepting or receiving a bribe as a reward for performing a 'relevant function' improperly e.g. asking for or accepting a gift in return for awarding a contract to an individual or Company.
- Using a bribe to influence a foreign official to gain a business advantage.



The Company may commit an offence if:

- The Company or an associated person commits bribery on its behalf to gain or retain an advantage.

3.3 A 'relevant function' includes public, state or business activities, or any activity performed in the course of a person's employment, or on behalf of another company or individual, where the person performing that activity is expected to perform it in good faith, impartially or in accordance with a position of trust.

#### **4 Entertainment and Hospitality**

4.1 The Director will accept/approve corporate entertainment and hospitality proposals only where they demonstrate a clear business objective and are appropriate to the nature of the business relationship. The Director will not accept/approve entertainment or hospitality where it considers a conflict of interest may arise or where it could be perceived that undue influence or a particular business benefit was being sought (for example, prior to a tendering exercise)

4.2 Requests to arrange or attend entertainment or hospitality events must be submitted in writing by the relevant associated person to the Director well in advance of the proposed dates detailing where possible:

- The type of event and venue.
- The cost or value.
- The objective of the proposed client entertainment/expenditure.
- The identity of those who will be attending.
- The organisation that they represent.
- Details and rationale of the proposed activity.

4.3 Entertainment and hospitality events must not be offered or attended unless prior approval by the Director has been received.

4.4 It is anticipated that there will be circumstances when it is not appropriate for the Director or an associated person to be provided with the entertainment, for



example where there could be a real or perceived conflict of interest, and in which case they will be required to politely refuse.

## **5 Receiving Gifts**

- 5.1 Any gifts or rewards offered and received by associated persons from any third party including clients, public officials, suppliers or other business contacts should be reported immediately to the Director.
- 5.2 It is anticipated that there will be circumstances when it may not be appropriate to retain such gifts and the Director or associated person may be required to politely return the gifts to the sender, for example where there could be a real or perceived conflict of interest.
- 5.3 Where gifts are retained, they should be made available for random distribution between the Director and relevant associated persons.

## **6 Promotional Expenditure**

- 6.1 Any promotional expenditure is to be authorised by the Director.

## **7 Record keeping**

- 7.1 The records that are to be retained by the Director are saved in an electronic form in a file on the Company server named "Record of Hospitality and Gifts".

## **8 Reporting Suspected Bribery**

- 8.1 EDGEidesign Ltd depends on the Director and associated persons to ensure that the highest standards of ethical conduct are maintained in all its business dealings.
- 8.2 Associated persons who suspect an act of bribery, may be taking, or has taken place, are required to report their concerns immediately to the Director. Issues that should be reported include:
  - Any suspected or actual attempts at bribery.
  - Concerns that other associated persons may be being bribed.



- Concerns that other associated persons may be bribing third parties e.g. clients or government officials.
- 8.3 Any reports of incidents or suspected bribery will be thoroughly and promptly investigated by the Director in the strictest confidence. Associated persons will be required to assist in any investigation.
- 8.4 Associated persons who report instances of bribery in good faith will be supported by EDGEdesign Ltd and in turn will ensure that the individual is not subjected to detrimental treatment as a consequence of his/her report.
- 8.5 An instruction not to report, or to cover up, any wrongdoing is deemed to be an offence by the Company. If any associated person is instructed not to raise, report or pursue a concern they should not agree to remain silent and should report the matter immediately to the Director.
- 9 Breach of Policy**
- 9.1 The Director and associated persons are responsible for ensuring they adhere to this policy at all times. EDGEdesign Ltd will fully investigate instances of alleged or suspected bribery.
- 9.2 An associated person suspected of bribery may be suspended from duty or from carrying out work whilst an investigation is carried out.
- 9.3 Any breach of this policy is likely to constitute a serious contractual and criminal matter for the associated person(s) concerned.
- 9.4 A breach of this policy by an associate will be addressed as a contractual matter. EDGEdesign Ltd may terminate the contracts of any associated persons found to have breached this policy, including consultants or other workers who act for, or on behalf of, the company.
- 9.5 EDGEdesign Ltd may also report the matter to the relevant authorities, including the Director of Public Prosecutions, Serious Fraud office, Revenue and Customers Prosecutions Office and the police. EDGEdesign Ltd will provide all necessary assistance to the relevant authorities in any subsequent prosecution.



**Please contact the Director, Dale Webster, if you wish to discuss any issue that is covered by this policy. EDGEdesign Ltd reserves the right to change this policy prior to the review date where exceptional circumstances apply.**

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The Director of EDGEdesign Ltd approved this policy on the 10<sup>th</sup> September 2025.

Signed:

A handwritten signature in black ink that reads "Dale Webster". The signature is written in a cursive style with a large, sweeping initial "D".

Dale Webster, Director  
(Signed on behalf of EDGEdesign Ltd)

Next review date: September 2026