



## **ANTI CORRUPTION, ANTI BRIBERY AND FRAUD PREVENTION POLICY**

The purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery and corruption regulations, and to ensure that the Company's business is conducted in a socially responsible manner.

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal or a breach of trust. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.

We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. However, we remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both at home and abroad.

This policy applies to the management team and all Associates who work with Eliem Ltd and the policy covers:

- Bribes;
- Gifts and hospitality;
- Facilitation payments;
- Political contributions;
- Charitable contributions

We will not engage in any form of bribery, either directly or through any third party (such as an agent or distributor).

### **Gifts and Hospitality**

We will not offer gifts or hospitality which could be regarded as illegal or improper, or which violates the recipient's policies; or

Employees may not accept any gift or hospitality from our business partners if:

- it exceeds £50 in value for each individual gift or £100 in value for each hospitality event (not to exceed a total of £500 in any financial year), unless approved in writing by the MD; or

- it is in cash; or
- there is any suggestion that a return favour will be expected or implied.

If it is not appropriate to decline the offer of a gift, the gift may be accepted, provided it is then declared to the employee's manager and donated to charity.

We appreciate that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift should always be considered.

### **Facilitation payments and kickbacks**

Our strict policy is that facilitation payments must not be paid.

### **Political Contributions**

We do not make donations, whether in cash or kind, in support of any political parties or candidates.

### **Charitable contributions**

We support a number of charities and will continue to do so through in-kind services, knowledge, time, or direct financial contributions. We only make charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made without the prior approval of the MD.

### **Responsibilities**

The Directors will annually sign a declaration confirming their understanding and compliance with this policy. Associates working under the umbrella of the organisation will also be asked to confirm their compliance with the policy.

Any Director or Associate who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with other workers if they breach this policy.

J M CLARK  
March 2014