

## Policy status

This policy was adopted by the Company on 14<sup>th</sup> July 2020 and last reviewed 24 September 2021

## Our Policy

Statlog Pro Limited is committed to the prevention, detection, and elimination of all forms of bribery and corrupt business practice. This commitment is central to the value we place on ethical behaviour, probity and reliability as a company.

We do not tolerate any form of bribery or corruption and will strive to ensure that we meet our obligations under the Bribery Act 2010 as a minimum standard.

## Scope of the Policy

This policy applies to everyone working at Statlog Pro Limited including employees, temporary workers, trainees, work experience students, contractors, and consultants as well as potential new employees.

Statlog Pro Limited also expects its business partners, especially those introducing business to us, to promote and adhere to this policy or practice the equivalent standards. This affects how we work with both our clients and our suppliers of goods and services.

We will not do business with third parties who fail to demonstrate that they conduct business in a manner which is consistent with this Policy.

## Background

The Bribery Act 2010 modernises the law on bribery and came into force on 1 July 2011.

Bribery is defined as an inducement for an action, which is illegal, unethical or a breach of trust. Inducements can take the form of gifts, loans, fees, rewards, or other advantages. Corruption, on the other hand, is defined as the misuse of entrusted power for personal gain.

Within the Act's Guidance the Government has recommended that commercial organisations wishing to prevent bribery should be informed by six principles. The Bribery Act 2010 (the "Act") exposes Statlog Pro Limited, its directors, managers and employees to potential liability and therefore Statlog Pro Limited has taken the following steps to ensure that the contents of the Act and subsequent guidance issued by the Ministry of Justice are addressed and adhered to.

### Principle 1 - Proportionate procedures

Procedures are clear, practical, accessible, effectively implemented and enforced and appropriate to the bribery risks faced by the company.

### Principle 2 - Management commitment

Senior management is committed to preventing bribery and corruption and enforcing this policy.

### Principle 3 - Risk assessment

The nature and extent of the company's exposure to potential risks of bribery are assessed both internally and externally. The assessment is periodic, informed and documented.

### Principle 4 - Due diligence

Bribery risks are mitigated by due diligence procedures on a proportionate and risk-based approach.

### Principle 5 - Communication

Bribery prevention policies and procedures are embedded within the company and understood throughout through effective communication and training.

### Principle 6 - Monitoring and review

Anti-bribery and corruption procedures are regularly monitored and reviewed. Improvements are made where necessary.

## Our Commitment

### Guidance and Procedures

This policy takes into account the proportionate risks faced due to our operational activities and is fully endorsed by our Partners.

### Corporate Hospitality, Promotional Expenditure and Gifts

Our policy on giving and receiving corporate hospitality and gifts is designed to ensure that personnel are not, and are not perceived to be, engaging in unethical business practice. This means that our personnel will never seek, accept or give a bribe, facilitation payment, kickback or other improper payment. We will also ensure that we operate with appropriate transparency in all our business dealings.

Personnel are prohibited from giving gifts, corporate hospitality or other inducements to, or accepting them from a third party without appropriate permission and documentation.

An employee or any member of their family should not, directly or through others, solicit or accept money, gifts, hospitality or anything else that could influence or reasonably give the appearance of influencing the relationship with that organisation or individual.

Gifts or hospitality may not be accepted, irrespective of value, which might influence or be seen to influence such situations as the award of business (contract) or the use of DHP (UK) LLP's Intellectual Property or other assets, or to benefit personally or for the benefit of any person connected to that person.

Unless our staff have been informed otherwise they may accept:

An occasional gift of nominal value, such as an advertising novelty, when it is customarily offered to others having a similar relationship with that individual or organisation.

Occasional meals or entertainment provided that the expenses are kept at a reasonable level and the aim of the event is to further a business relationship.

For the avoidance of doubt:

Occasional is defined as no more than once in any six-month period

A record of all gifts or hospitality received (with a value of more than £10) must be entered into the logbook.

Gifts with a value of more than £25 and hospitality expected to cost in excess of £50 must be authorised by line managers.

Where gifts with a value of more than £25 or hospitality costing in excess of £50 have been accepted within the last six months, then the staff concerned must not specify that particular supplier without providing full justification and obtaining written approval to proceed from your line manager. Permission will only be granted where the line manager believes that acceptance is for the genuine furtherance of the business relationship, that acceptance will not unduly influence any procurement decisions and where there is no personal gain or perception of personal gain.

Gifts or hospitality in excess of £100 must never be accepted.

If an excessive gift or hospitality is offered, then the circumstances will be discussed at Partner level and appropriate action agreed i.e. a gift can be returned, or steps can be taken to ensure that the acceptance of hospitality does not influence a decision or situation in favour of the giver.

If excessive gift(s) or hospitality are accepted, or the record of gifts / hospitality is found not to have been completed, or acceptance of any gift or hospitality is found to have influenced decisions inappropriately, against Company policy (or potentially illegally), then appropriate disciplinary procedures will followed (which could include immediate dismissal for gross misconduct).

DHP (UK) LLP maintains a register of details of any hospitality or gifts offered or received.

### Communication

We are committed to allocating adequate resource to communicate the policy to ensure that employees understand their obligations under the Bribery Act and under this policy, including the potential sanctions for non-compliance.

## Incident Reporting

Personnel are encouraged to report potential breaches of the Bribery Act or Statlog Pro Limited's Anti-Bribery & Corruption Policy to their line manager or the Senior Partner. Any breaches will be dealt with under the disciplinary procedures set out in our Equality & Diversity Policy.

In the event of criminal conduct Statlog Pro Limited will cooperate fully with the police and/or other relevant enforcement agencies.

## Formal review

We formally review this policy annually to ensure it is relevant and up to date.

## Staff induction and training

In order to ensure that all who work at DHP understand this policy and our commitment, this policy is provided to all new employees during their induction period. In addition, refresher training is given to all staff annually.



**Signature:**

**Date:** 24<sup>th</sup> September 2021

**Name:** Andrew Etherington

**Position:** Director