



ANTI-BRIBERY POLICY (GLOBAL)

Version 1.1

Contents

1. Introduction	1
2. Offences under the Bribery Act	1
3. Prevention of bribery	2
4. Hospitality and gifts	2
5. Facilitation Payments	3
6. Non tolerance	3
7. Employee Declaration:.....	3

1. Introduction

IES has always been committed to the highest standards of openness, integrity and accountability in its business transactions.

The Bribery Act 2010 applies to all transactions conducted by IES wherever in the world they happen. This policy is designed to clarify the main aspects of the law and how it may impact on your role.

1.1 Definition

Bribery is defined as ‘giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for having already done so.’ Ministry of Justice, 2010.

2. Offences under the Bribery Act

- Offering or giving a bribe
- Asking for or receiving a bribe
- Offering, promising or giving a bribe to a foreign public official
- Failing to prevent bribery – includes failing to stop bribes being given or accepted by third parties acting on behalf of the company

2.1 Offering or giving a bribe.

IES will not offer or give a bribe to anyone in order to secure business or to facilitate business activity.

2.2 Asking for or receiving a bribe

IES will not ask for or receive a bribe from anyone in order to secure business or to facilitate business activity.

2.3 Foreign public officials

IES will not offer, promise or give a bribe to a foreign public official in order to influence his/her functions as a public official.

2.4 Prevention of bribery

IES will not permit a third party to offer or give a bribe to anyone in order to secure business or to facilitate a business activity.

IES will not permit a third party to ask for or receive a bribe to anyone on our behalf in order to secure business or to facilitate a business activity.

IES will not permit a third party to offer, promise or give a bribe to a public official on our behalf, regardless of the culture of the country in which that official operates.

3. Hospitality and gifts

Hospitality and promotional activity which is intended to reflect your good relations with a client or potential client are permitted as long as there is no suggestion that this is in return for improper actions on behalf of yourself or the recipient. Examples of permitted activities include the following

- buying or accepting a drink or a meal
- providing or accepting a ticket for a sporting event
- offering or accepting a gift under the value of £100 such as a bottle of wine, hamper of food or promotional gifts.
- paying for reasonable travel expenses in order to provide services or demonstrate products and services to a client or potential client.

Illegal activities include lavish gifts or hospitality which are unusual in the market in which you are operating such as

- unusually high value gifts
- holiday accommodation or flights paid for by a client which is unrelated to a demonstration of their products or services.

4. Facilitation Payments

Facilitation payments, which are payments to induce officials to perform routine functions which they are otherwise obligated to provide, are bribes and are prohibited under the Bribery Act.

Examples of facilitation payments include

- a payment made to a customs official to speed up the progress of a consignment through the customs procedure
- a payment made to an immigration official in order to secure entry to a foreign country.

Legally required administrative fees or fast track services are not facilitation payments and should continue to be paid.

5. Non tolerance

IES will not tolerate breaches of the above guidelines by directors, employees, resellers or associates of the company. Misconduct in this respect may result in disciplinary action which could include dismissal from the company in line with the company disciplinary procedures. If employees suspect that bribery has taken place or they have been offered or asked for a bribe they should report the matter to their line manager or HR department.

If you are in any doubt about or wish to discuss anything relating to preventing bribery, please contact the HR team.

6. Employee Declaration: I have read and understood the above Anti-bribery Policy and agree to abide by the contents.

Signature:

Name:

Date: