



ANTI-BRIBERY AND CORRUPTION POLICY

Policy Statement

The Board of Richard Western Ltd are committed to business practices which prohibit bribery in any form, whether direct or indirect. The company will not tolerate employees, or third parties representing the company, being involved in bribery, whether by offering, soliciting for, demanding or accepting bribes.

The aim

The aim of this policy is to create and maintain a trust-based and inclusive internal culture in which bribery is not tolerated and to ensure that business is conducted in a context free of bribery.

Scope

The scope of this policy includes bribery in any form, whether of public officials or private-to-private bribery as well as bribery within the business such as an employee making a bribe to win a promotion or to obtain an appointment for a friend or relative.

The legal position

UK law makes it illegal to bribe foreign, public or private officials or office-holders. Any UK national or international company can be prosecuted in the UK for this crime – even if no part of the offence took place in the UK.

The company's business transactions will be consistent with all laws relevant to countering bribery in all the jurisdictions in which we operate.

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Policy

Any donations to political parties, charitable contributions and/or sponsorships will be made openly and will not be used to obtain a business advantage. Records of all such transactions will be maintained and donations of £500 or over will be identified in the company's annual accounts, smaller donations will be disclosed in other ways e.g. on web site. Records will be reviewed annually to ensure payments fall within the guidelines of this policy.

The company prohibits the offering, giving or acceptance of bribes, gifts, hospitality or expenses by employees, or third parties representing the company, that could influence the outcome of a business transaction.

The company will conduct its procurement practices in a way that is fair, transparent and in accordance with this policy.

The company will conduct its recruitment practices in a way that is fair, transparent and in accordance with this policy.

Responsibility

All personnel are individually responsible for their actions and are obliged to adhere to and support this policy.

In the event of a bribe being offered it should be made clear to the perpetrator that the company operates a strict anti-corruption policy and the matter should be reported to a director of the company at the earliest opportunity. All such matters will be treated in the strictest confidence.

References

This document has been drawn up with reference to Transparency International's guidance document Anti-Bribery Principles. Transparency International is a non-governmental anti-corruption organisation.

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