



Anti-Bribery Policy

October 2020

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Summary

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

An organisation can be held liable for failing to prevent a person from bribing on behalf of the company. This includes the acts of agents and associates acting on behalf of the organisation.

There are four areas within the act that are offences, the first three are offences that are committed by individuals and the fourth is a corporate offence:

- 1. Promising or offering a bribe**
- 2. Requesting, agreeing to receive or accepting a bribe;**
- 3. Bribing a foreign public official;**
- 4. A corporate offence of 'failure to prevent bribery' by persons associated with an organisation.**

The penalties are severe with potentially unlimited fines and the possibility of imprisonment of up to ten years for individuals.

1. Introduction

enims Ltd is committed to ensuring that the highest standards of ethical business conduct and integrity in business activities in the UK and overseas.

In accordance with the Bribery Act 2010, enims Ltd will not tolerate any form of bribery either direct or indirect intentionally or otherwise by any employees, temporary worker, associates, contractors, agents or any persons acting on enims' behalf.

The scope of this policy covers everyone that acts or works for enims Ltd. This extends to associated persons and temporary workers for the organisation. Any breach of this policy is likely to incur serious disciplinary action being taken against you.

All employees and associated persons to enims Ltd are required to comply with this policy in accordance with the Bribery Act 2010.

2. What is Bribery?

Simply put, the act of 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.

This can range from seeking to influence a decision maker by giving an extra benefit which would not be considered to be a legitimate action as part of a tender process.

A criminal offence will be committed under the Bribery Act 2010 if:

- An employee or associated person acting for or on behalf of enims, promises, gives, requests, receives or agrees to receive bribes or;
- An employee or associated person acting for or on behalf of enims offers, promises, gives a bribe to a foreign public official with the intention of influencing that official in the performance of his/her duties and;
- enims does not have the defence that it has an adequate procedure in place to prevent bribery by its employees or associated persons.

3. When would enims be liable?

enims could be liable where someone who is associated with enims (employed or otherwise) commits a bribery offence. Instances such as paying a bribe specifically to obtain business, keep business, or gain a business advantage for the organisation.

Adequate procedures such as this document have been put into place to ensure that there is a defence for enims in such circumstances.

Normal activities of appropriate hospitality and the giving and receiving of modest gifts are not restricted by this policy.

4. What is prohibited?

In accordance with this policy, enims prohibits employees or any associated persons from offering, promising, giving, soliciting or accepting any bribe. This includes bribes that are made to ensure that a person or organisation improperly performs duties or functions to gain any commercial, contractual or regulatory advantage for the company in either obtaining or maintaining business for enims, or to gain personal advantage, financial or otherwise for the individual or anyone connected to the individual.

5. Individual Responsibilities

As an employee or associated person to enims you are required to:

- Read, understand and comply with the policy.
- Uphold the policy in preventing, detecting and reporting bribery and other forms of corruption.
- To notify senior management and the company secretary as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

Any employee that breaches this policy will face disciplinary action. enims Ltd reserves the right to terminate contractual relationship with associated persons if they breach this policy.

6. Preventing Bribery

All employees and associated people of enims have a responsibility to prevent, detect and report behaviour relating to bribery. Individuals are encouraged to raise concerns about any instance or suspicion of bribery or related behaviour at the earliest possible stage. If you are unsure what behaviour constitutes bribery or other prohibited act please contact a member of senior management with your concerns.

enims Ltd is committed to ensuring that an individual does not experience any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion of behaviour that an actual or potential bribery or other corruption offence has taken place or may take place in the future.

7. Consequences

Any breach of this policy will be treated as a serious disciplinary, contractual and criminal matter for the individual concerned. It is likely to cause serious damage to the reputation and standing of enims. The contracts of those involved may be terminated by enims, including associated persons and consultants that work for or who act for enims.

It should be noted that bribery is a criminal offence and may result in up to ten years imprisonment and the possibility of an unlimited fine for the company.

enims may also, in certain circumstances, report the matter to the Director of Public Prosecutions, Serious Fraud Office, Revenue and Customs and the Police. It is enims policy to provide all necessary assistance to the relevant authorities in any subsequent prosecution.

Policy Review

The review of this policy is the responsibility of the Senior Management Team and will be reviewed in line with our internal management systems. If any change is required, an updated policy will be issued to employees for completion of declaration (where necessary).

Signed:



Date: 20th October 2020