

Anti-Bribery & Corruption Policy

Introduction:

In the UK it is a criminal offence to offer, promise or provide – or request or accept – a bribe. In the UK it is also an offence for a commercial organisation to fail to prevent an incident of bribery, committed either by the company or by someone associated to the company in order to obtain or retain a business advantage.

TJ Evers operate a strict no tolerance policy towards bribery in all forms whether directly or through third parties.

This anti-bribery and corruption policy applies to all staff and business partners that are members of our supply chain and are expected to accept the terms and conditions of our policy.

This policy sets out our anti-bribery and corruption rules and explains what the company expects and the values TJ Evers represent.

TJ Evers complies with the requirements of GDPR.

Definitions:

Bribery is the offer or receipt of financial (or other) advantage to another person with the intention of inducing that person to act improperly.

Corruption is the misuse of entrusted power for gain.

Bribery and corruption could occur in situations such as tendering, appointing preferred suppliers, contractors and agents. Bribery and corruption can be found at all levels from site operatives through to governments.

Bribes are not always a matter of handing over cash. Gifts, hospitality and entertainment can be bribes if they are intended to influence a business decision.

TJ Evers promotes openness as a core value within the company and this transparency assists in combating any bribery and corruption in the workplace.

Statement of commitment to the Bribery Act:

TJ Evers does not tolerate any form of bribery or corruption and this policy demonstrates the company's approach to bribery and corruption.

Bribery is a criminal offence which can lead to criminal penalties. In addition, staff have a duty to TJ Evers and any breaches of this policy will result in prompt disciplinary action.

This policy will be reviewed and updated whenever necessary.

Guidelines for Complying with this Anti-Bribery & Corruption Policy:

- Act in accordance with TJ Evers' core values of openness and transparency.
- Comply with our requirements concerning any conflicts of interest.
- Record all activities and transactions accurately, completely and transparently.

- Follow appropriate due diligence and risk mitigation procedures before proceeding with any contract or other arrangement.
- Seek advice from a Director when unsure how to proceed.
- Report any suspected or actual breaches of this policy promptly and accurately to your line manager.
- Ensure that gifts or hospitality we offer are reasonable in terms of value and frequency.
- Directors to authorise all outward payments and to monitor any unusual activity

Do Not:

- Participate in any form of corrupt behaviour.
- Use company funds, in the form of payments or gifts and hospitality for any unlawful, unethical or improper purpose.
- Authorise or tolerate any improper payments to obtain, retain or improve business.
- Authorise anyone to offer or pay bribes on the company's behalf.
- Offer or give anything of value to a public official (or their representative) to induce or reward them for acting improperly in the course of their public responsibilities.
- Offer or accept gifts or hospitality if we feel it could influence a business decision.
- Directors are not to put staff in a situation that would encourage bribery or corruption.

Legislation:

The Bribery Act reforms the criminal law to provide a new, modern and comprehensive scheme of bribery offences that will enable courts and prosecutors to respond more effectively to bribery.

Specifically it creates:

- Two general offences covering the offering, promising or giving of an advantage and requesting, agreeing to receive or accepting of an advantage.
- A discrete offence of bribery of a foreign public official.
- A new offence of failure by a commercial organisation to prevent a bribe being paid for or on its behalf (it will be a defence if the organisation has adequate procedures in place to prevent bribery).

You can find out more via:

<http://www.justice.gov.uk/downloads/legislation/bribery-act-2010-guidance.pdf>

Signed:	
On behalf of TJ Evers Ltd	
Date:	18.12.2018