



Moreton Hayward Limited

Anti Bribery and Corruption Policy

Policy statement & Purpose

It is our policy to conduct all our business in an honest and ethical way. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate as well as implementing and enforcing effective systems to counter bribery or corruption.

This policy sets out our responsibilities and how we expect those working for us or with us to observe and uphold this policy, and provides information and guidance to those working for us or with us on how to recognise and deal with bribery and corruption issues.

Who should comply with this policy

This policy applies to all individuals working at all levels for the Practice (whether permanent, fixed-term or temporary), wherever located.

Definition of Bribery

Bribery is a common form of corruption and can be defined as the giving or receiving of anything of value or advantage to try and make someone do something improper or reward them for this. Bribes are illegal and the giving or receiving of them a criminal offence. In the UK, the Bribery Act 2010 (the Act) came into force on 1 July 2011.

Sanctions for non-compliance

The potential consequences of being convicted of a bribery offence include criminal penalties for both individuals and companies:

- Individuals can be jailed for up to ten years and/or receive an unlimited fine.
- Companies can receive unlimited fines.

Gifts and hospitality

This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties. The giving or receipt of gifts should be acceptable, if the following requirements are met:

- it is not made with the intention of influencing the company or a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
- the gift is given in MHL's name, not in an individual's name;
- it does not include cash;

In the UK it is customary:

- for small gifts to be given at Christmas time;
- taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time. For example, receiving or giving a gift from a supplier/client at the time that we are conducting a review process or re-tendering is not appropriate;
- it is given openly, not secretly; and/or
- it is not offered to, or accepted from, government officials or representatives, or politicians or political parties.

Donations

Donations are not appropriate. The company only make charitable donations that are legal and ethical under local laws and practices.

Your responsibilities

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us, with us or under our control. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your line Manager as soon as possible if you believe or suspect that a conflict with or breach of this policy has occurred, or may occur in the future.

We reserve our right to terminate our contractual relationship with any third parties if they breach this policy.

Training and communication

Our zero-tolerance approach to bribery and corruption must be communicated to all employees direct or otherwise associated with MHL.

Monitoring and review

We will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. MHL may request any associated party to confirm compliance with this anti-bribery policy on an annual basis.

Questions

If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries relating to this policy, please feel free to discuss with your Line Manager, the company's Practice Manager or the Director in Charge.

Director in ChargeMatthew Moreton

Practice ManagerMarie Moreton

Date: 1st July 2020