

## ***Anti-Bribery Policy***

The Coffey Group is committed to implementing and enforcing effective systems to counter bribery. Therefore it is the Coffey Group's policy to conduct all aspects of its business in an honest and ethical manner at all times. This policy applies to all individuals working for the Coffey Group, including anyone providing services to the organisation such as consultants, subcontractors and suppliers.

The aim of this policy is to help the Coffey Group act in accordance with the Bribery Act 2010 and maintain the highest possible standards of business practice and advise individuals of the companies 'zero-tolerance' to bribery. Under UK law (UK Bribery Act 2010), bribery and corruption is punishable for individuals by up to ten years imprisonment.

### **Policy statement**

The company will not:

- Make contributions of any kind with the purpose of gaining any commercial advantage.
- Make, or accept, "kickbacks" of any kind.

The company will:

- Keep appropriate internal records that will provide evidence for the business reason for making any payments to third parties.
- Encourage employees to raise concerns about any issue or suspicion of malpractice at the earliest possible stage.
- See that anyone raising a concern about bribery will not suffer any detriment as a result, even if they turn out to be mistaken.
- Provide gifts or hospitality within reason without the intention of persuading anyone to act improperly or to influence a public official in the performance of their duties.

### **Definitions**

**Bribe** is a financial or other advantage offered or given to anyone to persuade them to or reward them for performing their duties improperly or; with the intention of influencing them in the performance of their duties.

**Hospitality** is the practice of being hospitable this includes the reception and entertainment of guests, visitors. Such as; provide tickets to sporting events, take clients to dinner, offer gifts to clients as a reflection of our good relations, or pay for reasonable travel expenses in order to demonstrate our services to clients if that is reasonable and proportionate to our business.

**Kickbacks** or facilitation payments are typically small payments made in return for a business favour or advantage.

### **Employee Responsibility**

It is the responsibility of all employees to prevent and report conduct which has taken place which you suspect is a bribe (or corrupt). Any such incidents can be reported to a Senior Manger.

### **Non compliance**

#### **Staff**

Failing to observe Company policy may lead to disciplinary action in accordance with the contract of employment.

#### **Visitors**

In the event of a breach of the policy by other organisations, or individuals, the Coffey Group will take appropriate action.



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### Monitoring Policy

The policy will be monitored on an on-going basis to ensure that it addresses issues effectively.

The following will be monitored:

- That all individuals working for the Coffey Group are advised of the policy.
- Assessment of any reported incident or related occurrence.

Monitoring of the policy is essential to assess how effective the Coffey Group has been to establish control of its obligations.

### Reviewing Policy

This policy will be reviewed annually at the Management Review and, if necessary, revised in the light of legislative or organisational changes.

### Policy Amendments

Should any amendments, revisions, or updates be made to this policy it is the responsibility of the Company senior management to see that all relevant employees receive notice. Written notice and/or training should be considered.

Signed: 

Odran Madden

Managing Director Coffey Group

Date: 23/03/2017