



## ANTI-BRIBERY AND CORRUPTION POLICY STATEMENT

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The purpose of this policy statement is to publicly communicate to third parties the Exemplas Group of Companies' (the 'Company', 'us', 'we') position on bribery and corruption as set out in the Exemplas Anti-Bribery and Corruption Policy (the 'Policy'). As a wholly owned subsidiary of the University of Hertfordshire, we are subject to the provisions of UPR GV12: [https://www.herts.ac.uk/search?collection=herts-meta&query=UPR%20GV12%20&start\\_rank=1&sort=relevance](https://www.herts.ac.uk/search?collection=herts-meta&query=UPR%20GV12%20&start_rank=1&sort=relevance)

It is a criminal offence to offer, promise, give, request, or accept a bribe. Individuals found guilty can be punished by up to ten years' imprisonment and/or a fine. As an employer, if we fail to prevent bribery we can face an unlimited fine, exclusion from tendering for public contracts, and damage to our reputation. We therefore take our legal responsibilities very seriously.

We will uphold all laws relevant to countering bribery and corruption in respect of our conduct in the United Kingdom and abroad, including the Bribery Act 2010.

It is our policy to conduct all of our business in an honest and ethical manner; with a zero-tolerance approach to bribery and corruption and to enforce effective systems to counter bribery.

### **WHO IS COVERED BY THE POLICY?**

This policy applies to all persons working for us or any Group Company or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners, sponsors, or any other person associated with us, wherever located.

### **WHAT ARE BRIBERY AND CORRUPTION?**

Bribery is offering, promising, giving or accepting any financial or other advantage, to induce the recipient or any other person to act improperly in the performance of their functions, or to reward them for acting improperly, or where the recipient would act improperly by accepting the advantage.

An advantage includes money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or anything else of value.

A person acts improperly where they act illegally, unethically, or contrary to an expectation of good faith or impartiality, or where they abuse a position of trust. The improper acts may be in relation to any business or professional activities, public functions, acts in the course of employment, or other activities by or on behalf of any organisation of any kind.

Corruption is the misuse of office or power for private gain.

### **FACILITATION PAYMENTS AND KICKBACKS**

We do not make, and will not accept, facilitation payments or "kickbacks" of any kind.

Facilitation payments are typically small, unofficial payments made to secure or expedite a routine or necessary action (for example by a government official).

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

We avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.

### **GIFTS, HOSPITALITY AND EXPENSES**

The Policy (with reference to UPR GV12) allows reasonable and appropriate hospitality or entertainment given to or received from third parties, for the purposes of:

- (a) establishing or maintaining good business relationships;
- (b) improving or maintaining our image or reputation; or
- (c) marketing or presenting our products and/or services effectively.

We will monitor the effectiveness and review the implementation of this policy regularly considering its suitability, adequacy and effectiveness.

If you would like a copy of the Policy, email: [legal@exemplas.com](mailto:legal@exemplas.com).

Third parties are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage to:

**By Post:** Head of Legal and Data Privacy (Group General Counsel), Marcia Kilmurry, 3<sup>rd</sup> Floor, Titan Court, 3 Bishops Square, Hatfield, and Hertfordshire, AL10 9NE, UK.

**By Email:** [legal@exemplas.com](mailto:legal@exemplas.com)

For and on behalf of the Company

David Moule  
Chief Executive Officer  
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