Anti-Bribery and Corruption Policy

22nd August 2024

Dear valued colleague,

Message from Mr David Burton

As a responsible organisation, I am committed to conducting business with integrity and fairness. Our approach to anti-bribery and corruption is a key part of this.

This policy outlines what is expected from all of us across the business and is fully endorsed by myself and fellow Directors. Every one of us is responsible for understanding this policy and applying it to our daily roles.

All the Directors at Don-Bur have a zero-tolerance approach to bribery and corruption. All our employees must therefore, always comply with this policy. Non-compliance may result in disciplinary action being taken against any employee not adhering to this policy.

Yours Sincerely

For Don-Bur

David Burton
Managing Director

Anti-Bribery and Corruption Policy

Introduction

Don-Bur is committed to complying with all anti-corruption laws under the Bribery Act 2010 and always conducting our business in an ethical manner.

Allegations of corruption can do serious damage to our business reputation. Don-Bur has produced this policy which prohibits anyone employed by the company from paying or accepting bribes.

Don-Bur takes any violation of this policy seriously. Failure to observe the rules of this policy may result in disciplinary action or even termination of employment.

Policy Statement

Don-Bur prohibits anyone acting on its behalf from making or receiving payments or any other unlawful action. Actions that are unlawful or improper include receiving or paying bribes or giving, offering, or promising or receiving anything of value with the intention of influencing behaviour or a decision-making process to obtain or retain business.

All employees are responsible for complying with the UK Bribery Act 2010.

When & How to Report

The prevention, detection and reporting of bribery is the responsibility of all employees. If you are in a situation and unsure if your business is being offered a bribe or you are concerned that your conduct could suggest you are offering a bribe, the following must be considered:

- Have I consulted the right people?
- Can I explain my actions/decision to others and feel comfortable?
- Is it consistent with the company's behaviour and way of doing business?
- Is this legal?

If the answer to any of the above is 'no' or 'don't know' then stop and seek advice from a director of the business or HR before acting.
Central to the operation of this policy is transparency in our business dealings. It is therefore imperative that if you receive an offer that may be interpreted as a bribe, a payment or inducement – it must be declared to the company.

The Consequences of Bribery

Bribery is a serious matter and a criminal offence. Any employee who breaches the Bribery Act risks:

- Disciplinary investigation that may result in dismissal
- Criminal investigation resulting in a possible prosecution and a possible custodial sentence (this could result in up to a 10-year sentence or an unlimited fine)
- If you benefit financially, you risk prosecution / conviction under money laundering laws and proceeds of Crime Act 2002
- If you committed the act abroad, you may also be subject to that country's laws

As a company we risk, amongst other sanctions:

- Unlimited fines
- Irreparable reputational damage

Hospitality and Gifts

Hospitality, entertainment, and gifts that are frequent, lavish, or extravagant will be perceived to have influenced the recipient.

This policy is not designed to prevent staff from receiving hospitality or gifts but to set out clear guidance to avoid doubt and confusion. Hospitality and gifts should be both sensible and proportionate to the circumstances. The company expects you to disclose the receipt of any gift / hospitality in the course of your duties.

Giving Gifts

An employee may not directly or through others, offer or give any gifts, hospitality, money, or other items of value to any official, employee, supplier, customer, or any other organisation which if doing so could reasonably give the appearance of influencing the organisations relationship with the company. To do so could seriously damage our reputation and you may also be breaking the law.

Employee's (if allowed to do so) may do the following:

- Give a gift of nominal value such as stationary, pens etc. where appropriate
- Provide meals and other means of entertainment at external venues provided the expenses are reasonable and approval is given by the hosts line manager

- Provide means and overnight accommodation where this is reasonable and in the normal course of company business

Receiving Gifts and Hospitality

Staff must not accept any gifts or hospitality, regardless of value, which may influence or be perceived to be seen to influence situations such as awarding of contracts, use of company assets or to benefit another personally or professionally.
In the course of duties, staff may find themselves in a position where they are in receipt of gifts / hospitality in accordance with the Bribery Act 2010. Received hospitality and gifts must be both sensible and proportionate.

Acceptable Gifts and Hospitality

Unless you have been instructed otherwise, staff may accept the following:

- Gifts of nominal value such as advertising gifts (stationary etc) when it is customarily offered to others having similar relationships with that individual organisation

- Customary meals or entertainment provided that the expenses are reasonable and the meal / entertainment is within the usual course of business

- Any other gift which does not fall within the above criteria should be politely declined. There may be occasions where you have no warning that a gift or hospitality will be offered.

There are some circumstances where to refuse a gift could cause offence to your host. In those circumstances the gift / hospitality can be accepted but MUST be disclosed to the directors of Don-Bur.

Disclosing Gifts and Hospitality

If you are offered hospitality or gifts then the following procedure should be used, you must:

- Disclose the offer to your line manager prior to the event and they will seek authorisation for you to attend

- In the event of any doubt about any probity of such hospitality, advise should be sought from the HR department

- In exceptional circumstances, a gift that is personal in nature may be retained subject to approval by the company

Where can I get further help and advice?

If you are unsure about anything that has been covered in this policy, please take advise from a director of the business, HR, or your line manager.