

CONCEPT INTERIORS MANAGEMENT LTD

Anti-Bribery & Corruption Policy

This Anti-Bribery Policy exists to set out the responsibilities of Concept Interiors Management Ltd and those who work for us in regards to observing and upholding our zero-tolerance position on bribery and corruption.

It also exists as a source of information and guidance for those working for Concept, and helps them recognise and deal with bribery and corruption issues, as well as understand their responsibilities.

POLICY STATEMENT

At Concept we are committed to conducting business in an ethical and honest manner, and is committed to implementing and enforcing systems that ensure bribery is prevented. Concept has zero-tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly and with integrity in all business dealings and relationships.

Concept will constantly uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which we operate. We are bound by the laws of the UK including the Bribery Act 2010 in regards to our conduct.

Concept Interiors recognises that bribery and corruption are punishable by up to ten years of imprisonment and a fine. If our Company is discovered to have taken part in corrupt activities, we may be subjected to an unlimited fine, be excluded from tendering for public contracts, and face serious damage to our reputation. It is with this in mind that we commit to preventing bribery and corruption in our business, and take our legal responsibilities seriously.

WHO IS COVERED BY THE POLICY?

This Anti-Bribery Policy applies to all employees whether temporary, fixed term or permanent including all suppliers and sub-contractors.

DEFINITION OF BRIBERY

- i) Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting or soliciting something of value or of an advantage so to induce or influence an action or decision.
- ii) A bribe refers to any inducement, reward, or object/item of value offered to another individual in order to gain commercial, contractual, regulatory or personal advantage.
- iii) Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law.
- iv) Bribery is illegal. Employees must not engage in any form of bribery, whether it be directly, passively or through a third party (such as an agent or distributor. They must not accept bribes in any degree and if they are uncertain about whether something is a bribe or a gift or act of hospitality, they must seek further advice from the Company Director.

WHAT IS AND WHAT IS NOT ACCEPTABLE

This section of the Policy refers to 4 areas:-

- Gifts and Hospitality
- Facilitation Payments
- Political Contributions
- Charitable Contributions

Gifts and Hospitality:- Concept accepts normal and appropriate gestures of hospitality and goodwill so long as the giving or receiving of gifts meets the following requirements:-

- a) It is not made with the intention of influencing the party to whom it is being give, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits.
- b) It is not made with suggestion that a return favour is expected.
- c) It is in compliance with local law.
- d) It is given in the name of the company, not in an individual's name.
- e) It does not include cash or a cash equivalent (eg a voucher or gift certificate).

- f) It is appropriate for the circumstances (eg giving small gifts around Christmas or as a small thank you to a company for helping with a large project upon completion).
- g) It is of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift.
- h) It is given/received openly, not secretly.
- i) It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.
- j) It is not above a certain excessive value, as a pre-determined by the Company Director.

Where it is inappropriate to decline the offer of a gift (ie when meeting with an individual of a certain religion/culture who may take offence), the gift may be accepted as it is declared to the Company Director who will assess the circumstances.

Concept recognises that the practice of giving and receiving business gifts varies between countries, regions, cultures and religions, so definitions of what is acceptable and not acceptable will inevitable differ for each.

As good practice, gifts given and received should always be disclosed to the Company Director. Gifts from suppliers should always be disclosed.

The intention behind a gift being given/received should always be considered. If there is any uncertainty, the advice of the Company Director should be sought.

Facilitation Payments and Kickbacks:- Concept does not accept and will not make any form of facilitation payments of any nature. Concept does not allow kickbacks to be made or accepted. Concept recognise that kickbacks are typically made in exchange for a business favour or advantage.

Political Contributions:- Concept will not make donations, whether in cash, kind or by any other means to support any political parties or candidates.

Charitable Contributions:- Concept accepts the act of donating to charities – whether through services, knowledge, time or direct financial contributions (cash or otherwise) and agrees to disclose all charitable contributions it makes.

Employees must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery.

Concept will ensure that all charitable donations made are legal and ethical under local laws and practices, and that donations are not offered/made without the approval of the Company Director.

EMPLOYEE RESPONSIBILITIES

As an employee of Concept you must ensure that you read, understand and comply with the information contained within the Policy.

All employees and those under Concept's control are equally responsible for the prevention, detection and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this Anti-Bribery Policy.

If you have reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this Policy, you must notify the Company Director.

If any employee breaches this Policy, they will face disciplinary action and could face dismissal for gross misconduct. Concept has the right to terminate a contractual relationship with an employee if they breach this Anti-Bribery Policy.

1) HOW TO RAISE A CONCERN?

If you suspect that there is an instance of bribery or corrupt activities occurring in relation to Concept, you are encouraged to raise your concerns at as early a stage as possible. If you're uncertain about whether a certain action or behaviour can be considered bribery or corruption, you should speak to the Company Director.

2) WHAT TO DO IF YOU ARE A VICTIM OF BRIBERY OR CORRUPTION


You must tell the Company Director as soon as possible if you are offered a bribe by anyone or if you are asked to make one. If you suspect that you may be bribed or asked to make a bribe in the near future, or if you have reason to believe that you are a victim of another corrupt activity.

3) PROTECTION

If you report a concern relating to potential act(s) of bribery or corruption, Concept understands that you may feel worried about potential repercussions. Concept will support anyone who raises concerns in good faith under this Policy, even if investigation finds that they were mistaken.

Concept will ensure that no person suffers any detrimental treatment as a result reporting a concern relating to potential act(s) of bribery or corruption.

If you have reason to believe you've been subjected to unjust treatment as a result of a concern or refusal to accept a bribe, you should inform your Company Director immediately.

Signed: 
Name: **Mark Saunders**
Title: **Managing Director**
Dated: **9th December 2022**