

Anti-Bribery & Corruption Policy

The aim of this policy is to help J S Wright & Co Ltd to act in accordance with the Bribery Act 2010, maintain the highest possible standards of business practice and advise individuals of the Company's 'zero-tolerance' to bribery and corruption.

Background

The Bribery Act 2010 establishes that it is an offence for anyone working on behalf of an organisation to offer, accept or receive a bribe which results in gaining or retaining business. Anyone found guilty under this Act could face a fine and up to 10 years' imprisonment. This policy will set out the rules that must be adhered to within J S Wright & Co Ltd to ensure no bribery or corruption occurs.

It is both an offence to bribe or to ask for or receive a bribe. The Bribery Act 2010 creates four offences:

1. Bribing another person
2. Being bribed
3. Bribing a foreign public official
4. Failing to prevent bribery. (This offence can only be committed by corporate bodies)

Company Responsibility

J S Wright & Co Ltd will:

- 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.

Employee Responsibility

The following behaviour is unacceptable within J S Wright & Co Ltd:

- Accepting a financial or other reward from any person in return for providing some favour.
- Requesting a financial or other reward from any person in return for providing some favour.
- Offering any financial or other reward from any person in return for providing some favour.

Gifts, Hospitality and Expenses

From time to time, customers, suppliers or other persons might offer a gift to an employee. This could be a small item, or something of considerable value. All gifts, however small, must be reported to their Head of Department who will ensure it is recorded. No gifts with a value of more than £100.00 may be accepted. If a gift is offered and then refused because of its value, this must be reported to the Head of Department who will ensure it is recorded.

From time to time, clients, suppliers, or other persons might invite an employee to a hospitality event. All such invitations must be reported to the Head of Department for permission before acceptance.

It is the custom of J S Wright & Co Ltd to occasionally offer small gifts at times like Christmas to clients, suppliers, or other persons. If a gift is authorised by the Head of Department an employee is entitled to give it to the appropriate individuals. A record must be kept of all gifts.

J S Wright & Co Ltd occasionally runs hospitality events, primarily aimed at thanking clients and suppliers for their custom and loyalty. An employee must not organise any additional hospitality event without seeking authority from their Head of Department.

Whilst we believe that inviting guests for meals and to attend hospitality events is a normal part of developing positive relationships between professionals, such invitations must be restricted and proportional to the actual working relationship between the individuals involved. J S Wright & Co Ltd expects careful judgement to be exercised.

Only Heads of Department can authorise expense claims from employees. Heads of Department are expected to check and sign all expense claims against receipts submitted. Expense claims may not be paid without a valid receipt.

Any items of expenditure that give rise to concern should be fully investigated by the Head of Department and brought to the attention of the Managing Director.

Charitable Contributions

Payments made as donations to charity or political or organisations or parties and sponsorships may be used to as a subterfuge to hide bribery. Charitable contributions may only be made by the Managing Director after approval of the other Board Members.

Non Compliance

All employees have a role to play in enforcing the policy and are required to report any observed or reported breaches.

Any employee who is concerned that acts of bribery are occurring within J S Wright & Co Ltd should immediately report the matter to their Head of Department.

Any employee found to have offered or accepted a bribe will face disciplinary action which could include dismissal for gross misconduct.

Implementation of the Policy

Overall responsibility for policy implementation and review rests with the Company Senior Management, however, all employees are required to adhere to and support the implementation of the policy. The company will inform all existing employees about this policy and their role in the implementation of the policy. They will also give all new employees notice of the policy on induction to the company.

The policy will be monitored and reviewed and signed by the Managing Director on an annual basis. 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 received notice.

Any employee who breaches this policy will face disciplinary action which could result in dismissal for gross misconduct.

How to raise a concern

It is important that all employees raise any concerns about an issue or suspicion at the earliest possible stage. If you are at all unsure, then raise this concern with your Head of Department via an email and copy the Managing Director in.

J S Wright actively encourages openness and will support any employee who raises genuine concerns in good faith, even if they turn out to be mistaken.

Phil Leech
Managing Director
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