



**CLARUS**  
SITE SOLUTIONS

## **Anti-Bribery Policy**

## **POLICY STATEMENT**

This policy has been created to comply with the requirements of The Bribery Act 2010. Clarus has a zero-tolerance to bribery and corruption. This policy extends to all the Company's business dealings and transactions and these both have a wide interpretation across all functions. The policy is given force in a detailed anti-bribery programme which is regularly monitored and reviewed to capture changes in law, reputation, demands and changes in our business.

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

All Directors, Staff and Business Relationships.

## **WHAT IS BRIBERY?**

The offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action which is illegal or a breach of trust.

## **WHAT IS CORRUPTION?**

The abuse of entrusted power for private gain or advantage. It hurts everyone whose life, livelihood or happiness depends on the integrity of people in a position of authority.

## **HOW WILL THE POLICY BE IMPLEMENTED?**

The Policy will be implemented by:

- An anti-bribery programme which will be actively managed and communicated to all our staff, to ensure that the policy is fully and consistently delivered in all our business dealings and transactions across all functions.
- The visible commitment of the Directors leading to the encouragement of the full participation of all Staff and all our business relationships.
- The Directors will regularly monitor and review the events that could give rise to bribery, the risk exposure to these events and the adequacy of the risk treatments in place.
- Internal control issues including those identified by Internal and External Audit on implementing the policy and programme will be regularly reported to the Directors.

## **WHAT SPECIFIC CONTROLS ARE IN PLACE?**

Some of the Company's activities expose it to particular risks of being involved in corruption, in particular:

- **Corporate hospitality and gifts:** There is a risk that corporate hospitality, such as customer or supplier entertainment and the giving or receiving of gifts might be seen as bribery.
- **Facilitation Payments** – We do not make facilitation payments under any circumstances. These are small unofficial payments made to secure or expedite the performance of a routine or necessary action to which the payer of the facilitation payment has legal or other entitlement.

- **Sponsorship and charitable donations** – Any sponsorship for events and individuals and charitable donations can only be approved by the Directors, whose approval will be contingent on, among other things, their personal assessment that it is not a subterfuge for bribery. All such payments will be accurately recorded and clearly declared in our financial records, statements and reports.

#### **WHAT IS EXPECTED OF THE PEOPLE COVERED BY THIS POLICY?**

All Directors and staff will be required to:

- Understand how the policy and programme impact on themselves and their job.
- Attend any training or other events designed to communicate the policy and the programme.
- Comply with the policy and the anti-bribery programme at all times
- Re-sign the policy each year as evidence of their continued understanding of the policy, the programme and the impact on themselves and their own job.
- Seek advice if unclear or unsure of any aspect of this policy and programme.

In meeting these requirements no employee will suffer demotion, penalty or other adverse consequences for refusing to pay bribes even if the Company loses business.

All Business relationships will be required to:

- Understand how the policy and programme impact on themselves and their relationship.
- Attend any training or other events designed to communicate the policy and the programme.
- Comply with the policy and the anti-bribery programme at all times
- Sign the policy as evidence of their continued understanding of the policy, the programme and the impact on themselves and their own relationship. This may be part of the contract terms for Suppliers or in documentation appropriate to the relationship.
- Seek advice if unclear or unsure of any aspect of this policy and programme.

#### **WHAT ARE THE PENALTIES OF BREACHING THIS POLICY?**

The Bribery Act 2010 makes provision for individual and corporate responsibility with imprisonment for up to 10 years and unlimited fines depending upon the nature of the offence for individuals and corporate fines that may be unlimited

Directors and Staff will be subject to our disciplinary procedures which could result in dismissal. There is also the possibility that criminal and/or civil legal action will be taken.

Those acting in a Business Relationship (including Agents, Suppliers and Contractors) with Clarus will have their business relationship terminated, the matter will be reported to the appropriate authorities and there is the possibility of criminal and/or civil legal action.

Signed:



Debra Andrews

Date: 20<sup>th</sup> February 2018

Position: Director

Version: 2

Reason: signature added