



Anti-Bribery & Corruption Policy

Human Resources
April 2023

Make more possible.



Version Control

Name	Date	Reason for Change	Version Number
HR	May2018	New Format	V3
HR	Jan 2022	Review	V4
HR	Apr 2022	Review	V5
HR	Apr 2023	Review	V6

Anti-bribery and Corruption Policy

Introduction

On 1 July 2011 the UK Bribery Act was brought into force. This policy sets out APS's approach to preventing, monitoring and reporting activity involving bribery and corruption.

Scope and application of this policy

The principles apply to both internal and external parties, including anyone wishing to undertake business or engage with APS.

The Bribery Act extends across all areas of the UK and also includes non-UK activities and employees (where the main base of the organisation is the UK).

The conduct of APS directors, employees, consultants and others directly involved in delivering APS's business activities forms an essential part of APS's governance arrangements and ethical standards.

General rules relating to conduct and disciplinary action are contained within individual employment terms and conditions and the company's employee handbook. The specific principles and procedures in place relating to the prevention of bribery and corruption are summarised within this policy.

Principles

APS is committed to the highest level of ethical standards and sets high standards of impartiality, integrity and objectivity in relation to its business activities. APS does not in any way partake in, or condone, activities involving bribery and corruption and adopts a zero-tolerance approach to it.

Bribery Act 20185

The principal provisions of the Bribery Act include:

- two general offences covering the offering, promising or giving of a bribe (active bribery) and the requesting, agreeing to receive or accepting of a bribe (passive bribery) (sections 1 and 2);
- a discrete offence of bribing a foreign public official in order to obtain or retain business or an advantage in the conduct of business (section 6);
- an offence which can be committed by commercial organisations which fail to prevent bribery committed on their behalf (section 7);
- raising the maximum sentence for bribery committed by an individual from 7 to 10 years' imprisonment.
- The maximum sentence for an offence committed by a corporate body is an unlimited fine

Active Bribery

APS will not tolerate any activities which encourage, imply, bestow, tolerate or promise an unfair, unlawful, improper or unethical advantage to any individual, group or organisation, regardless of whether there is financial inducement or not.

To eliminate or reduce the likelihood and opportunity for active bribery, APS has adopted the six principles outlined in the new Act:

1. Proportionate procedures

Through policy creation and implementation and internal auditing procedures, and also through the publication of financial accounts and enforcement of disciplinary and authority reporting procedures, where appropriate.

2. Top-level commitment

Through the managing director and senior management team who are committed to preventing bribery by persons associated with APS, and undertaking a policy of transparent reporting.

3. Risk assessment

Through the identification of risk areas/roles and individual training.

4. Due diligence

Through processes created to identify internal and external risk areas and the proportion of risk attached.

5. Communication

Through general employee awareness, communication and training, and specific training for identified risk areas.

6. Monitoring and review

Through periodic compliance monitoring and review procedures and through financial controls and constraints.

APS does not tolerate the acceptance of bribes to induce a favourable business decision. At all times APS expects its directors, employees and any consultants acting on its behalf to conduct their work ethically, and to fully comply with their terms and conditions of employment and APS's policies and procedures.

Guidelines for avoiding active and passive bribery

▪ Gifts

Directors, employees and consultants are only permitted to accept and keep token gifts of very low value such as pens, diaries and small promotional items. Accepting and keeping all other gifts is not permitted. In the rare circumstances where a gift cannot be returned or declined, the item may be donated and a record of the donation kept.

As a guide, occasional, low-value gifts up to an approximate value of £20 are acceptable. Please make your line manager aware of any gifts you accept or of inappropriate gifts (due to value or timing) which are offered to you

▪ Business Entertainment

Business entertainment of clients or suppliers should be commensurate with the client/supplier account. All expenditure should be met by the most senior person in attendance, in line with the company's expense policy.

▪ Hospitality

Acceptance of a corporate hospitality request requires prior approval from an appropriate member of the senior management team. See also APS Expenses policy.

In all cases, please check the event or gift is proportionate to the client account or supplier services. Also consider the timing of such events/gifts in relation to business activities, i.e.

tenders or contract negotiations, and how these may be construed.

FOC Work

We occasionally produce jobs free of charge, e.g. for a charitable cause. Before accepting a request for an FOC job, firstly agree it with your line manager.

Declaration of conflicts of interest

A 'conflict of interest' is considered to be any connection or association with a third party that is (or appears to be) against the best interests of APS, or which could enable an employee reasonably to be suspected of using their position within APS to gain an unfair advantage for or from a third party.

Conflicts of interest are best avoided altogether; however, APS acknowledges that they are sometimes unavoidable. In such circumstances the principles of openness and integrity apply and employees are required to disclose and manage the conflicts accordingly.

Collusion

In respect of business activities such as tenders, bids, pricing agreements and contractual negotiations, we expect our employees and suppliers to act in good faith. This applies to (but isn't limited to):

- the pricing of tenders
- submission of tenders
- requesting or providing information regarding bids from external sources including the transfer of tender documents to other parties
- incentives or other means of canvassing a competitive advantage

Bribing officials

APS will not tolerate any form of bribery to produce a favourable outcome. APS does not permit the bestowal of lavish hospitality or expensive gifts.

Reporting actual or potential bribery concerns

It is important that all employees are able to report their concerns without fear of reprisal and are aware of the means to do so. The Public Interest Disclosure Act 1998 (the "Whistle-blowers Act") provides appropriate protection for those who voice genuine and legitimate concerns through the proper channels.

In the first instance, any suspicion of bribery, fraud, theft or any other irregularity should be reported, as a matter of urgency, to the employee's line manager. If such action would be inappropriate, concerns should be reported upwards to one of the following persons:

- Head of Department or are
- Any Director
- Corporate Services Director
- Managing Director

Every effort will be made to protect an informant's anonymity if requested. Individuals with evidence or firm suspicion of an employee's involvement in active or passive bribery should contact the corporate services director on 0161 495 4500.