

ANTI-BRIBERY AND CORRUPTION POLICY



POLICY STATEMENT

The purpose of our full Policy document is to set out Bell Group UK's Policy on the giving and receiving of gifts, hospitality and entertainment, and our responsibilities to ensure transparency, provide clarity on acceptable behaviour and comply with the UK Bribery Act 2010.

Bribery

Bribery is the offering, promising, giving, solicitation or the receipt or agreement to receive any financial or other advantage, or any other inducement from any person or company, (wherever they are situated and whether they are a public official or body, a private person or company) by an individual employee, agent or other person or body acting on another's behalf.

Corruption

Corruption is the abuse of entrusted power for a private gain.

Our Principle

As a general policy Bell Group UK does not believe that giving and receiving gifts is appropriate to the efficient conduct of our organisation. We shall not offer, give or receive bribes or improper payment in any circumstances. Nor shall we participate in any kind of corrupt activity, either directly or through a third party, for instance to secure new business, extend a current agreement, or increase our monetary income. We will not allow any others working on our behalf to do this either.

We will always be clear and transparent in any tender process with clients and customers in relation to extending agreements, the award of new work or a change in agreed pricing terms. This also applies to suppliers in relation to prices and/or terms and conditions of our trade agreements. We shall ensure that all agreements in relation to our supply chain and client services are clearly documented and we shall ensure that any variations to our contract, rebates or offers of work are appropriate, correct and fairly considered.

We will never participate in any form of corrupt behaviour or act without consultation of the Executive Board.

Taking our Responsibilities Seriously

All employees are accountable for their actions and are required to conduct business with integrity. If in doubt regarding inappropriate behaviour or a particular course of action, you should seek guidance from your Line Manager, Branch Manager or Regional Director. Each Bell Group employee is expected to be familiar with and follow the policies, laws and regulations that apply to our jobs; conduct our business according to the highest ethical and legal standards; and, if we ever become concerned that Bell Group or our colleagues are falling short of these standards, to voice our concerns. This policy represents guiding principles only – it cannot anticipate all circumstances and situations that employees may encounter. The exercise of good judgement is still expected from employees at all times. The policy does not alter the terms and conditions of your employment, rather it assists each of us in knowing what is expected of us and where to go for advice and help if necessary.

ANTI-BRIBERY AND CORRUPTION POLICY



Avoiding Bribery and Corruption Risk

Bell Group is committed to ensuring adherence to legal and ethical standards in every aspect of the way in which we operate our business. This is not just a cultural commitment on the part of the Organisation; it is a legal requirement. Bribery is a criminal offence and corrupt acts expose us and our employees to the risk of prosecution, fines and imprisonment, as well as endangering Bell Group's reputation. It is Bell Group's policy to conduct business in an honest way, without the use of corrupt practices or acts of bribery to obtain an unfair advantage. Any form of benefit whether financial or not can be considered to be a bribe, if given with the requisite intention.

Avoiding Fraudulent practices

Bribery in procurement decisions is any advantage which constitutes the provision of an improper advantage. For example, any advantage which improperly influences a decision maker in order to award a contract to Bell Group could be considered a bribe. Careful consideration needs to be given as to whether any advantage offered could be considered a bribe. Advantages which could be considered as a bribe are benefits provided personally to a decision maker or a group of decision makers which lead them to breach duties of good faith to a third party. Fraudulent practices are strictly prohibited. This includes practices which can impair, harm or influence procurement or selection or contract execution. Such practices involve any acts that mislead, whether recklessly or intentionally, any person, involved in the procurement, selection or contract execution process.

The Company recognises that the giving and accepting of gifts, entertainment and hospitality can sometimes be part of building normal business relationships. This practice can vary significantly between the various geographical locations in which Bell Group does business. However, regardless of local laws and customs, some gifts and hospitality can lead to the suggestion that an improper influence has been asserted either on or by Bell Group, or that a conflict of interest has arisen. In some instances, the giving and/or receiving of gifts and entertainment can be interpreted as a bribe, which is unlawful and which can lead to criminal prosecution for those individuals involved as well as the company. If in doubt, please discuss issues with your Branch Manager.

The prevention, detection and reporting of bribery or corruption is the responsibility of all persons within or associated with Bell Group UK. If you wish to report any misconduct or need to clarify any dubiety over possible bribes or corruption, please contact your Branch Manager or Regional Director. Alternatively, reports can be made confidentially to our Human Resources Manager, Paramjit Barry via email to HR@bellgroup.co.uk