



IMS POLICY

ANTI-BRIBERY AND CORRUPTION POLICY

BELL GLOBAL PROPERTY SERVICES LIMITED



Table of Contents

1	Policy Statement.....	4
1.1	BRIBERY	4
1.2	CORRUPTION	4
1.3	OUR PRINCIPLE	4
1.4	TAKING OUR RESPONSIBILITIES SERIOUSLY	4
1.5	AVOIDING BRIBERY AND CORRUPTION RISK	4
1.6	AVOIDING FRAUDULENT PRACTICES.....	5
1.7	EXCEPTIONS	5
1.8	APPLICATION OF THIS POLICY.....	5
2	Procedure	6
2.1	GIFTS.....	6
2.2	HOSPITALITY AND ENTERTAINMENT	7
2.3	NON-COLLUSION.....	7

1 Policy Statement

The purpose of this Policy document is to set out the Bell Global Property Services (UK) Ltd 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. Bell Global Property Services Ltd, hereon in shall be referred to as Bell, BGPS, or Bell Global, and includes all wholly owned trading subsidiaries; (Bell Group Ltd, CB Contracts (NI) Ltd, Paint My Home by Bell Ltd).

1.1 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.

1.2 Corruption

Corruption is the abuse of entrusted power for private gain.

1.3 Our Principle

As a general policy Bell Global Property Services 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.

1.4 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 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 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.

1.5 Avoiding Bribery and Corruption Risk

Bell 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's reputation. It is BGPS' 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.

1.6 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 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.

1.7 Exceptions

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 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 Global Property Services Ltd, 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.

Bell Global Property Services values its reputation for ethical behaviour and for financial probity and reliability. We recognise that over and above the commission of any crime, any involvement in bribery will also reflect adversely on our image and reputation. The aim of this Policy is therefore to ensure that the highest standards of integrity are maintained and that it can never be suggested that there was an improper motive behind the offer or acceptance of the gift or hospitality, of unduly influencing the recipient, or on the part of the recipient in accepting it.

Our aim is to limit the Company's exposure to bribery and corruption by:

- Setting out a clear Anti-Bribery & Corruption policy;
- Training employees so that they can recognise and avoid the use of bribery or corruption by themselves and others;
- Encouraging our employees to be vigilant and to report any suspicion of bribery or corruption, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately;
- Rigorously investigating instances of alleged bribery or corruption and assisting the police and other appropriate authorities in any resultant prosecution;
- Taking firm and vigorous action against any individual(s) involved in bribery.

1.8 Application of this Policy

This Policy applies equally to employees of Bell Global Property Services and individuals who may not be directly employed by the Company, but who are carrying out duties on behalf of, or for the benefit of, Bell Group Limited. Bell Global Property Services absolutely forbids corruption and the paying or receipt of bribes for any purpose.

2 Procedure

2.1 Gifts

For the purposes of this Policy, a gift can be anything with cash or face value, such as a bottle of wine or tickets to an event where the giver/host is not present.

1. Receipt of Gifts

- a) Any member of staff who is given a gift of any sort by a business contact (e.g. customer, supplier, etc — actual or potential) must disclose the fact of the gift and its nature to his or her immediate superior.
- b) If Bell Management decides that the gift might constitute a bribe or other inducement, the employee will be required to give the gift to a Director who will return it to the donor with a suitable covering letter.
- c) In other instances, the employee will be required to return the gift to the donor with a polite note explaining Bell Global Property Services' policy.
- d) In exceptional cases, for example where BGPS decides that the gift was made as a token of the donor's gratitude for a service carried out to a very high standard, the recipient will be allowed to retain the gift.
- e) You may never offer, give, or accept a gift of cash, regardless of the value.
- f) You are permitted to give or accept gifts of negligible value. For the purposes of this Policy a gift will be treated as having negligible value if it has a face value (including VAT) of £50 (or equivalent) or less and it is customary to give or receive such a gift in the ordinary course of business. Examples of acceptable gifts might be calendars, diaries, or a bottle of wine or spirits at Christmas.
- g) Promotional gifts such as stationery, which are not of significant value, are also exempt from this policy and need not be disclosed. However, staff are reminded that, since such gifts are sent only to a limited number of employees, they should be distributed to other members of staff where appropriate.
- h) Gifts with a face value of over £50 can only be given or accepted if it is for a legitimate business purpose and you have obtained written approval from the Regional Operations Director. Such consent will only be given where the Director considers that the gift could not be mistaken for an inducement. If you are offered a gift that falls outside of this exception you must, politely but firmly, refuse it.
- i) Failure to disclose gifts will constitute a disciplinary offence which will be handled in accordance with Bell Global Property Services Ltd.'s formal disciplinary procedure. If the gift in question was of significant value and, for example, the recipient is in a position to influence business dealings with the donor, the offence may be treated as gross misconduct.

2. Giving Gifts

- a) Although it is not Bell Global Property Services' policy to offer gifts to suppliers, customers, or other stakeholders, Bell recognises that, on occasion, this may be necessary, for example when someone carries out work on a voluntary basis or for a nominal fee. Equally, it may be decided that a gift would be appropriate if a service has been carried out in an exceptional manner.
- b) In such a case, employees should put a request in writing to the Operations Director stating:
 - c) Who the gift is for
 - d) Why it should be given
 - e) The nature of the gift
 - f) Its approximate value.
- g) If the request is approved, the Regional Operations Director will arrange to purchase the gift and arrange for its dispatch where necessary.
- h) Employees who send gifts which have not been approved in accordance with this procedure will not be reimbursed for the cost of the gift. Further, such action may, depending on the circumstances, be treated as a disciplinary offence which will be dealt with under the formal disciplinary procedure.
- i) Employees must never attempt to give any gifts during a tender process, as this could be construed as bribery or inducement.

2.2 Hospitality and Entertainment

For the purposes of this Policy, hospitality or entertainment involves attendance at an event where the host is present. The Policy applies whether Bell Global Property Services is the host or the guest. If the host is not present, attendance at an event must be considered a gift.

You are permitted to give or accept corporate hospitality of negligible value. For the purposes of this Policy entertainment or hospitality will be treated as having negligible value if it has a face value (including VAT) of £250 (or equivalent) or less per person and we recognise that it is customary to give or receive such hospitality in the ordinary course of business. Examples of acceptable hospitality and entertainment might be dining out or tickets to a sporting event, theatre, or music concert. In such circumstances the hospitality or entertainment must be officially acknowledged by a Bell Director.

If you are offered entertainment or hospitality that falls outside this exception you must politely but firmly, refuse it. However, if you reasonably consider that the acceptance or the offer of hospitality would be in the best interest of Bell (for example, because it is for genuine business relationship building) and that hospitality has a face value (including VAT) of between £250 and £500 or equivalent per person, you should seek the prior written consent of the Regional Operations Director before accepting or giving the invitation to the hospitality. Such consent will only be given where the Regional Director considers that the entertainment or hospitality could not be mistaken for an inducement. In such circumstances the hospitality or entertainment must be acknowledged on behalf of Bell Global Property Services.

Hospitality or entertainment offered to relatives or friends by a third party must always be refused, regardless of their value and you should never offer a gift to the friends or relatives of any third party during the course of your employment or carrying out your duties for Bell Global Property Services.

2.3 Non-Collusion

The essence of selective tendering is that the Employer or Client shall receive bona fide offers from all firms entering into a competitive tender arrangement. In recognition of this principle, Bell certifies that for any bona fide tender or offer submitted intended to be competitive, we have not fixed or adjusted the amount of the tender under any agreement or arrangement with any other party.

We also certify that we have not done, or that we will not do at any time, any of the following acts:

1. communicate to any person, association or entity other than individuals calling for such tenders, the amount, or approximate amount of the proposed tender;
2. enter into any agreement or arrangement with any other person or organisation that they shall refrain from tendering or in relation to the amount of any tender to be submitted
3. share information or details of the bid to be submitted which may be deemed as secure or confidential information;
4. offer, give or agree to pay any sum of money, valuable or favour, directly or indirectly, to any person for giving or causing consideration or change in relation to any tender or proposed tender for work, of the sort described above.

Bell Global Property Services Ltd prohibits:

Bribery or acts of corruption by any person or company, in any jurisdiction, wherever they are situated and whether they are a public official or body or private person or company or by any individual employee, agent or other person or body acting on the Group's behalf in order to:

- i. gain any commercial, contractual, or regulatory advantage for the Group in a way which is unethical or
- ii. gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual or
- iii. induce the improper performance of any function that is of a public nature, connected with a business, performed by a body, or performed by a person in the course of their employment

When acting for BGPS Ltd, political contributions are not allowed and charitable contributions are allowed only within agreed corporate schemes and guidelines.

Facilitation payments are any payment made (except where comprised in a lawful and published tariff of general application) as an inducement to secure or expedite the performance of a routine or necessary action to which the payer of the facilitation payment has a legal entitlement. These are not, in any form, permitted or condoned by the Group.

The prevention, detection and reporting of bribery or corruption is the responsibility of all persons within or associated with Bell Global Property Services. Reports can be made confidentially to:

Tracy Brescia
Group Director
01236 766878
t.brescia@bellgroup.co.uk