



## ETHICS & ANTI-BRIBERY POLICY

IVC Brunel is committed to conducting business in an ethical and honest manner. We will constantly uphold all laws relating to anti-bribery and corruption in all jurisdictions in which we operate. We are bound by the laws of the UK which include the Bribery Act 2010.

This policy applies to all employees (whether permanent or temporary), consultants, contractors, agents, third parties or any person or persons associated to the company. The policy also applies to Officers, Trustees and Board members.

Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision.

A bribe refers to any inducement, reward, or object/item of value offered to another individual on order to gain commercial, contractual, regulatory, or personal advantage.

Bribery is illegal. Employees must not engage in any form of bribery, whether it be directly, passively or through a third party (such as an agent of distributor). They must not accept bribes in any degree and if uncertain about whether something is a bribe or a gift or act of hospitality, they must seek advice from the Ethical Company Compliance Officer, Stacey Springthorpe.

Gifts to staff can raise the appearance, if not the reality, of dishonest or unfair dealings. Therefore no employee, or member of his or her family may seek to receive gifts including money, cash equivalent, loans or other benefits (including services and discounts as well as material goods) from any supplier, customer, or competitor unless part of a previously arranged company wide arrangement.

Our policy is to donate all Christmas gifts received to the Company Christmas raffle where all staff have the opportunity to benefit from such gifts. Gifts of nominal value such as pens, notepads, calendars etc are acceptable under this policy and may be retained by the recipient.

Any gifts offered or received (discounting the above exceptions), should be declared to the Ethical Company Compliance Officer at the earliest opportunity.

As a company, we are also committed to meeting additional ethical obligations. This policy sets out individual responsibilities in as follows:

**Quality** – every employee is expected to demonstrate a commitment to quality in everything he or she does. We rely on quality at source which means we must ensure we get it 'right first time'.

Honesty – Everyone is expected to deal openly and honestly with others. This means we must accept responsibility for mistakes and not participate in the cover-up of events. Performance problems or inter-personnel conflicts will be dealt with and discussed when they first rise and not left unresolved. Staff are expected to raise ethical concerns and report any actual or suspected ethical misconduct to the Ethical Company Compliance Office . Where it can be shown that staff have chosen to ‘overlook’ potential ethical violations, their actions may be regarded as misconduct and will be dealt with under the Disciplinary procedure.

Fairness – all staff should treat their fellow colleagues with fairness and respect. All employees will be given equal opportunity to succeed regardless of their race, colour, sex, religion, age, national origin, sexual orientation or disability. Harassment will be dealt with under the Disciplinary procedure (please see the Harassment policy for further details on what constitutes as harassment).

Confidentiality – By the very nature of its business, the company has dealings with a variety of companies who may be in direct competition with each other. It is vital therefore that every staff member understands the need to maintain customer confidentiality by not discussing or disclosing commercially sensitive information with any colleague, customer, supplier or member of the public.

Conflict of interest – Employees should not run ‘side businesses’ in their spare time which compete with, sell to, or buy from the company. Where employees are employed in second jobs, they should inform their Manager immediately.

Employment – Employees will be recruited in line the company recruitment policy which ensures that all recruitment is fair and free from discrimination. All recruitment will also be in line with legal requirements in relation to payment of wages, workers must be the minimum legal age (no child labour) and all employment will be freely chosen (no forces, bonded or prison or involuntary prison labour will be used). All employees rights in relation to freedom of association and the right for collective bargaining will be respected. The company follows the ethical principles as stated in the ETI basecode.

Use of company time and recourses – When at work, you are expected to use your time and equipment provided to carry out your duties on behalf of the company. Use of company property for personal use may only be authorised by a departmental Manager.

The company is committed to conducting affairs with honesty and integrity. Employees should show good judgment in offering entertainment of customers or suppliers and such expense should be contained at reasonable levels.

Payment – payment should only be made by the company to third parties for services or products properly provided to the company. The company absolutely prohibits illegal consultations with competitors regarding customers, prices or operational areas.

The company will comply with all law where it operates e.g. safety, environmental, employment etc.

Any concerns relating to the companies operations, conduct or behavior of colleagues, should be reported immediately to Stacey Springthorpe (Ethical Company Compliance Officer).

Should any employee be found to be in breach of this policy, it would likely result in disciplinary action including dismissal on the grounds of gross misconduct.

If you have any queries in relation to this policy, please see a member of the HR Department.