

Anti-Bribery & Corruption Policy

The Bribery Act 2010 came into force on the 1 July 2011 and includes offences of: offering or receiving bribes, bribery of foreign public officials and failure to prevent a bribe being paid on an organisation's behalf. The Act specifically contains a 'new' offence under Section 7, which can be committed by commercial organisations which fail to prevent persons associated with them from bribing another person on their behalf.

Bribery is a criminal offence. We will not accept or pay a bribe, facilitation payment, kickback, or other improper payment or inducement to any person or company for any purpose, nor will we accept such improper payments or inducements from any client, supplier, or sub-contractor.

The Company expects its employees to demonstrate honesty, integrity and fairness in all aspects of their business dealings and exercise appropriate standards of professionalism and ethical conduct in all their activities. The Company expects the same approach to doing business from its business partners and suppliers. Pursuant to this the Company will not tolerate bribery¹ or corruption² in any form and has a 'zero tolerance' approach to any breach of this policy.

We will take appropriate steps to ensure that:

- We do not, directly or indirectly, offer, promise, give, accept or demand a bribe or other undue advantage (including excessive gifts and hospitality) in-order to obtain or retain business, or gain any other improper advantage. This includes not sharing client confidential information.
- We do not offer, nor give in to demands, to make illicit or illegal payments to agents, public officials (at whatever level), or the employees of business partners or anybody else that we do business with.
- We engage and remunerate agents and other third parties only for legitimate services and adopt appropriate transparency in our approach.
- We promote employee awareness of, and compliance with, company policies against bribery and corruption through appropriate dissemination of our own procedures (including disciplinary procedures) policies and training programmes on induction and subsequently.
- We adopt management control systems that discourage bribery and corruption, and adopt financial and tax accounting and auditing practices that prevent the establishment of "off the books" secret accounts or the creation of documents which do not properly and fairly record the transactions to which they relate.
- We do not make illegal or inappropriate contributions to candidates for public office or to political parties or to other political organisations.
- We raise awareness of the need to combat bribery and corruption with our business partners by publication of this Policy and (where appropriate) relevant contractual provisions and support initiatives designed to reduce the risk of bribery and corruption.

Application

We must always ensure that we operate with appropriate transparency in all our business dealings. If you are in any doubt as to whether something is right, ask your line manager or seek guidance from your appropriate Director. If you are still uncomfortable or are concerned by the actions of others you can also use the confidential email info@synergizecl.co.uk if you consider that it would be inappropriate to report the issue through line management or have any concern about confidentiality.



This Policy and all relevant obligations and responsibilities have been communicated throughout the organisation.

This policy is publicly available upon request.

¹ *Definition: The receiving/offering/giving/providing/requesting/accepting of a financial or other advantage, in order to seek to induce a person or to induce a person to give improper assistance in breach of their duty, or to otherwise influence someone with the underlying purpose of obtaining/retaining business, or an advantage in the course of business. "Bribery" for this purpose includes so-called "facilitation" or "grease" payments, defined as non-discretionary payments made to government or public officials to speed up routine administrative processes, even if such payments are nominal in amount.*

² *Definition: The misuse of entrusted power/breach of duty for personal gain.*