

## **Charles Muddle Ltd**

### **Anti-bribery and anti-corruption policy**

#### **What is bribery?**

This is the act of offering something of value to influence a decision leading to an ultimate business advantage or benefit.

To be more specific, it refers to offering, giving, asking, promising, agreeing, receiving something of value to influence a behaviour, action or decision.

Charles Muddle Ltds' (Charles Muddle) employees must not take part or engage in any form of bribery as it is an illegal act.

#### **Policy contents**

This anti-bribery policy sets out the responsibilities of Charles Muddle and everyone who works for us to observe and uphold our zero-tolerance position on bribery and corruption.

#### **Policy statement**

Charles Muddle is committed to conducting business in an ethical and honest way, and is committed to implementing and upholding systems and processes that guarantee bribery is prevented. Charles Muddle has zero-tolerance for bribery and corrupt activities. We are committed to acting professionally and fairly in all business dealings and relationships.

Charles Muddle will respect and uphold all laws in relation to anti-bribery and corruption in all the jurisdictions in which we operate. We work and are bound to the laws of the UK, including the Bribery Act 2010 relating to our behaviour and conduct both in the UK and overseas.

Charles Muddle understands that bribery and corruption is not tolerated and punishable by up to ten years of imprisonment and a fine. If Charles Muddle is found to have taken an active role in corrupt activities, we may be liable to an unlimited fine, face exclusion from tendering for public contracts, and receive negative public relations. With this in mind, we take our legal responsibilities very seriously.

## **Who this policy covers**

This policy covers all employees and associated third parties:

- Permanent
- Part time
- Contractors
- Consultants
- Apprentices
- Agency staff
- Sponsors
- Sister companies (and their employees)
- Any persons associated with us (including suppliers and third parties)

Any agreements or arrangements Charles Muddle makes with a third party is subject to clear contractual terms including the requirement for the third party to comply with minimum acceptable standards and procedures relating to anti-bribery and corruption.

## **Kickbacks and facilitation payments**

We understand facilitation payments are a form of bribery and we will not accept or make any form of facilitation payments of any kind.

Kickbacks are not tolerated at Charles Muddle. We recognise that kickbacks are made in exchange for a business advantage or favour.

## **Gifts and hospitality**

We accept appropriate gestures of goodwill and hospitality. However, the giving and receiving of gifts must meet the following requirements:

- It is appropriate to the situation or circumstance, e.g. box of chocolates for Christmas and to thank the company for their help in completing a large project
- It is not made with the expectation that a return favour must be reciprocated
- It is not given to a key individual with the clear intention to influence them
- It must be given in a company name – not an individual
- It must not contain cash
- It complies with local law
- It is not made with the intention of influencing the third party to whom it is being given or to receive a business advantage of any kind
- It is not given in secret
- It is not above £100

On some occasions it may be inappropriate to decline an offer of a gift, e.g. when meeting with someone from another country who may take offence due to a different culture

All gifts given and received are disclosed to our group compliance manager – especially those from suppliers.

## **Our responsibilities**

We ensure our employees read, understand and comply with the information contained in this policy and any training or other anti-bribery and corruption information given.

If any of our employees breach this policy, they will face disciplinary action and face dismissal for gross misconduct. We have the right to terminate a contractual relationship with an employee if they breach this anti-bribery policy.

## **Raising a concern**

If you believe there is an instance of bribery or corrupt activities taking place in connection with Charles Muddle, please express your concern as early as possible. We would ask that you speak with our group compliance manager, Robin Plater.

## **Political and charitable contributions**

Charles Muddle will not support any political parties by making improper donations in cash, or kind, to gain an improper business advantage.

We encourage raising and donating money for good causes that resonate with our business values. We disclose all charitable donations we make.

We ensure our employees understand charitable contributions are not used to facilitate and conceal acts of bribery.

## **Dealing with bribery or corruption**

Please tell our group compliance manager if you feel a bribe or corrupt behaviour is taking place in relation to Charles Muddle. This might involve being offered a bribe or being coerced into making a bribe – or if you feel you are a victim of some form of corrupt activity.

## **Safeguarding and protection**

As a result of refusing to accept or offer a bribe, Charles Muddle will make sure no one receives adverse treatment due to reporting the concern.

Adverse treatment refers to disciplinary action, dismissal or detrimental treatment in connection to the concern raised.

## **Communication**

Our anti-bribery and corruption policy will be clearly communicated to all employees, contractors, suppliers and third parties at the outset of any working relationship.

**Record keeping**

Charles Muddle will record and keep accurate financial documents and have the necessary internal controls and processes in place to act as evidence for all payments made. We will declare and keep a written record of the amount and reason for hospitality or gifts accepted and given, and understand that gifts and acts of hospitality are subject to managerial review.

**Ongoing review**

Our group compliance manager monitors and reviews this policy on a regular basis.

This policy does not form part of an employee's contract of employment and Charles Muddle may amend it at any time to improve its effectiveness at dealing with bribery and corruption.

Our internal control processes and procedures have been written to prevent bribery and corruption and are subject to regular reviews and audits to ensure they continue to work effectively.