

Anti-Bribery Policy

Bribery is a Criminal Offence and as such SQS's commitment to conducting business without the use of corrupt practices or bribery is a legal requirement

This policy applies to all those employed by and associated with the company.

Offering Bribes

The company expressly prohibits any person employed by or associated with it from offering, promising or giving any financial or other advantage to another person where it is intended that the advantage will bring about improper performance by another person of a relevant function or activity, or that the advantage will reward such improper performance.

Accepting bribes

The company expressly prohibits any person employed by or associated with it from requesting, agreeing to receive or receiving any financial or other advantage with the intention that a relevant function should be performed improperly as a result of the advantage or as a reward for performing the relevant function improperly.

The improper performance of a relevant function in anticipation of receiving financial or other advantage is also prohibited.

Bribing a Public Official

The company expressly prohibits the bribing of a UK or foreign public official in order to obtain or retain business or an advantage in the conduct of business.

Relevant Functions and Activities

Relevant functions and activities are any function of a public nature, any activity connected with the business, any activity performed in the course of a person's employment and activity performed by or on behalf of a body of persons where the person performing that function or activity is expected to perform it impartially, in good faith, or is in a position of trust by virtue of performing it.

Hospitality and Business Gifts

The Bribery Act 2010 does not seek to prohibit reasonable and proportionate hospitality, advertising, sponsorship and promotional or other similar business expenditure, as it is recognised that this constitutes an established and important part of doing business.

However, hospitality, promotional and similar business expenditure can be used as bribes.

The Company expressly prohibits the giving and receiving of hospitality/business gifts and similar where the intention in doing so is to receive or confer an advantage in return for giving or receiving the hospitality/business gift or similar.

The following procedures should be adopted in relation to hospitality and business gifts.

1. All offers of business gifts should be referred to the Director and should only be accepted if clearance has been received from him or her
2. Business gifts should not be made without the permission of the Director
3. A record of all business gifts made and received and the reason for the gift should be retained by HR.
4. All hospitality must be proportionate and reasonable. Guidance should be sought from the Director as to whether the planned hospitality is proportionate and reasonable.
5. Records should be maintained of all hospitality provided and accepted, including cost and reason for providing or accepting the hospitality. The records are held by HR (copy attached).
6. Quid pro quo arrangements are expressly prohibited
7. Cash gifts are not allowed under any circumstances.
8. The provision or acceptance of entertainment of a sexual nature is expressly prohibited.
9. Acceptable hospitality and entertaining may include modest meals with people with whom we do business (such as providing a modest lunch after a meeting) or the occasional provision of or attendance at sporting or cultural events, provided that the intention is to build business relationships rather than to receive or confer an advantage
10. The provision of small promotional gifts, such a diary, pens or similar, will generally be regarded as acceptable.
11. Managers reviewing expense claims should be alert to the provision of hospitality/business gifts that may be construed as a bribe.
12. All concerns should be reported.

New Business, Change in Business and Contracts with External Parties

Where a business relationship with an external party is sought or newly established, or the nature of the relationship is changed, appropriate due diligence must be exercised to ensure that there are no circumstances giving rise to a concern. That external party must also be made aware of this anti-bribery policy.

Donations

Any charitable donation must be agreed with the Owner Directors.

The Company expressly prohibits the making of charitable donations where the purpose of the donation is to secure an advantage. All charitable donations must be made without expectation of reward.

Reporting Concerns

All employees have a responsibility to prevent, detect and report all instances of bribery. Employees should therefore be alert to the possibility of bribery.

Anyone who has concerns regarding acts or potential acts of bribery should speak to their Line Manager in the first instance. If for any reason a person is not able to speak to his or her Line Manager, he or she should contact a Director or use our Whistleblowing process.

All reports will be treated with the utmost confidentiality.

Further information about reporting concerns is available in the company's Whistleblowing policy.

Training and Communication

All employees will be made aware of the anti-bribery policy to ensure that they understand both the policy and the procedures that they need to follow in order to comply with it.

Sanctions

The company treats breaches of the anti-bribery policy with maximum seriousness and will investigate any potential breach in accordance with the disciplinary procedure. The ultimate sanction for a breach of the policy will be summary dismissal for gross misconduct.