



# Anti-Bribery and Corruption Policy

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## Aims

The Root Of It has a strict anti-bribery and corruption policy in line with the Bribery Act (2010). The Act defines a bribe as giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for having already done so.

This policy should be read alongside the Financial and Whistleblowing Policies.

## Declaration of conflicts of interest

A 'conflict of interest' is considered to be any connection or association with a third party that is (or appears to be) against the best interests of the company, or which could enable an employee to be suspected of using their position within the company to gain an unfair advantage for or from a third party.

Conflicts of interest are best avoided altogether; however, we acknowledge that conflicts of interest (and potential conflicts) are sometimes unavoidable. In such circumstances the principles of openness and integrity apply and staff are required to disclose and manage the conflicts accordingly.

## Receipt of Gifts

Staff working relationships may bring them into contact with outside organisations where it is normal business practice or social convention to offer hospitality, and sometimes gifts. Offers of this kind to you or your family can place you in a difficult position. Therefore no employee or any member of his or her immediate family should accept from a supplier, customer or other person doing business with The Root Of It, payments of money under any circumstances, or special considerations, such as discounts or gifts of materials, equipment, services, facilities or anything else of value unless:

- They are in each instance of a very minor nature usually associated with accepted business practice.
- They do not improperly interfere with your independence of judgement or action in the performance of your employment.

In every circumstance where a gift is offered, the advice of the line manager must be sought.

## Kickbacks or Facilitation Payments

The company does not accept and will not make any form of facilitation payments of any nature. We recognise that facilitation payments and kickbacks are a form of bribery that involves expediting or facilitating the performance of an action.

## **Responsibilities**

If you bribe (or attempt to bribe) another person, intending either to obtain or retain business for the company, or to obtain or retain an advantage in the conduct of the company's business this will be considered gross misconduct. Similarly accepting or allowing another person to accept a bribe will be considered gross misconduct. In these circumstances you will be subject to formal investigation under the Company's disciplinary procedures, and disciplinary action up to and including dismissal may be applied.

## **Raising concerns**

If you have any concerns then you can approach the CEO in confidence or refer to the process in company's Whistleblowing Policy.

## **Review**

This policy will be reviewed annually.

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