

ID	SN-HS-38	Person Responsible	W Dee	Date Last Updated	12-04-18	Revision	5	Status	Released
----	----------	--------------------	-------	-------------------	----------	----------	---	--------	----------



PMC SAFETY NETTING LTD GIFTS AND BRIBERY POLICY

Definition

Bribery is the accepting of gifts, money, hospitality or other favours in return for providing something of value to the briber. The purpose of this policy is to set out the rules that must be followed in this organisation to ensure that no bribery occurs.

Unacceptable Behaviour

The following behaviour is unacceptable, and must not occur in this organisation.

- Accepting any financial or other reward from any person in return for providing some favour
- Requesting a financial or other reward from any person in return for providing some favour
- Offering any financial or other reward to any person in return for providing some favour

Business gifts

From time to time, customers, suppliers or other persons might offer a gift to an employee. This could be a small item or something of considerable value. All gifts, however small, must be reported to Senior Management. No gifts with a value of more than £100 may be accepted. If a gift is offered and then refused because of its value, this must be reported to Senior Management.

Hospitality

From time to time, customers, suppliers or other persons might invite an employee to a hospitality event. All such invitations must be reported Senior Management. Permission must be given by Senior Management before an employee accepts.

Responsibilities of Supervisory Management

Supervisory Management are responsible for keeping a record of all gifts and hospitality that are offered and/or received by employees working in the Supervisors area of responsibility.

If Supervisors are concerned about any actions, they should contact the Managing Director immediately for advice.

Supervisors are also responsible for ensuring that all their employees are aware of this policy, and fully understand the rules in relation to the acceptance of gifts and hospitality.

Expenses

Supervisors must authorise all expense claims from their employees. Any items of expenditure that give rise to concern should be fully investigated.

Attempts to Bribe

Any employee who is concerned that he or she is potentially being bribed should report this matter to his or her Supervisor immediately.

Disciplinary Action

Any employee found to have offered or accepted a bribe will face disciplinary action which could include dismissal for gross misconduct.

ID	SN-HS-38	Person Responsible	W Dee	Date Last Updated	12-04-18	Revision	5	Status	Released
----	----------	--------------------	-------	-------------------	----------	----------	---	--------	----------

Raising Concerns

If an employee is concerned that acts of bribery are occurring in the organisation they should inform a Director in the first instance. If this course of action is inappropriate, the employee should inform the Managing Director

Signed:



M Atkinson
Managing Director

Date of Issue: 12th April 2018

Revision dates: 08/03/2018 – 12/04/2018