



Anti-Bribery Policy Statement

Appris is committed to carrying out its business functions in an honest and ethical manner and to observing the provisions of the Bribery Act 2010, in respect of its conduct. On 1 July 2011, the Bribery Act came into force, and its provisions apply to all Appris operations. The Bribery Act creates a number of new bribery and corruption offences and holds businesses liable for failing to prevent bribery carried out on their behalf, irrespective of whether the bribe takes place in the UK or overseas. The sanctions for these offences include up to 10 years' imprisonment for the individuals responsible. In addition, if Appris is found to have connived in or consented to acts of corruption undertaken in its name, the penalties include personal liability for directors and an unlimited fine and significant reputational damage for Appris. This policy outlines how Appris is implementing and enforcing effective systems to counter bribery. The purpose of this policy is to:

This policy applies to all individuals working at all levels and grades, including directors, employees (whether permanent, fixed-term or temporary), consultants, seconded staff, agency staff, volunteers, or any other person associated with Appris wherever located in our Head Office, on site or otherwise engaged in Appris business.

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. Acts of bribery or corruption are designed to influence the individual in the performance of their duty and incline them to act dishonestly.

It is an offence under the Bribery Act to: offer or receive a bribe, bribe an official; and consent or connive to the commission of a bribery offence by anyone associated with Appris.

The sanctions for these offences include up to 10 years' imprisonment for the individuals responsible. In addition, if Appris is found to have connived in or consented to acts of corruption undertaken in its name, the penalties include personal liability for directors an unlimited fine and significant reputational damage for the business. Examples of a bribe include:

1. You offer a potential client tickets to a major sporting event, on condition that they agree to do business with Appris as a result. This would be an offence as you are making the offer to gain a commercial and contractual advantage. Appris may also be found to have committed an offence because the offer has been made to obtain business for Appris.
2. If a supplier gives a member of your family a job, but makes it clear that in return they expect you to use your position to influence the chances of obtaining Appris business or another advantage to them in return. It is an offence for a supplier to make such an offer. It would be an offence for you to accept the offer as you would be doing so to gain a personal advantage. Suppliers who are found to have committed a bribery offence will no longer be used by Appris.

This policy is consistent with other organisational policies and is available to our customers, suppliers and to the general public on request. It will be reviewed annually for continuing suitability during formal management reviews.

John Igoe
Managing Director

Refer to pages 2 and 3 for further details

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POTENTIAL RISK SCENARIOS:

The matters set out below illustrate a number of scenarios which indicate an increased risk of an offence under the Bribery Act being committed:

- a) You become aware that a third party engages in, or has been accused of engaging in, improper business practices;
- b) You learn that a third party has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a "special relationship" with officials;
- c) A third party insists on receiving a commission or fee payment before committing to sign up to a contract, or carrying out a process;
- d) A third party requests payment in cash and/or refuses to sign a formal contract or to provide an invoice or receipt for a payment made;
- e) A third party requests that payment is made to another recipient different from who did the work;
- f) A third party requests an unexpected additional fee or commission to "facilitate" a service;
- g) A third party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services;
- h) A third party requests that a payment is made to "overlook" potential legal violations;
- i) A third party requests that you provide employment, a place on a course, or some other advantage to a friend or relative;
- j) You receive an invoice from a third party that appears to be non-standard or customised;
- k) A third party insists on the use of side letters or refuses to put terms agreed in writing;
- l) You notice that Appris has been invoiced for a commission or fee payment that appears large given the service stated to have been provided;
- m) A third party requests or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to Appris
- n) You are offered an unusually generous gift or offered lavish hospitality by a third party.

GIFTS AND HOSPITALITY

This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties. However, gifts, hospitality and political or charitable donations will be bribes if they are given or received with the intention of influencing business decisions. When giving or receiving gifts and hospitality, you should consider whether the following requirements are met:

- (a) It is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
- (b) It complies with UK law
- (c) It does not include cash or a cash equivalent (such as gift certificates or vouchers);
- (d) Taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time; and it is given openly, not secretly.

WHAT IS NOT ACCEPTABLE

It is not acceptable for you (or someone on your behalf) to:

- (a) Give; promise to give, or offer a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given.
- (b) Give, promise to give, or offer, a payment, gift or hospitality to "facilitate" or expedite a routine procedure.

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- (c) Accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them.
- (d) Accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return.
- (e) Threaten or retaliate against a colleague or third party who has refused to commit a bribery offence or who has raised concerns under this policy.
- (f) Engage in any activity that might lead to a breach of this policy.

RESPONSIBILITIES

- (a) You must ensure that you read, understand and comply with this policy.
- (b) The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for or associated with Appris. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- (c) Effective risk assessment in order to evaluate and mitigate risk is an essential element of this policy.
- (d) You must notify your line manager and a director as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.
- (e) Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct.

RECORD-KEEPING

Appris has a duty to monitor the fact that the terms of the Bribery Act are being observed by employees, workers and those associated with the business. Appris is required to keep financial records and to have appropriate internal controls in place, which will evidence the business reason for making payments to third parties. You must declare and keep a written record of all hospitality or gifts accepted or offered. You must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with the travel and expenses procedure.

HOW TO RAISE A CONCERN

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries, these should be raised with your line manager in the first instance. If you or your line manager requires further guidance, you should speak to a director.

WHAT TO DO IF YOU ARE A VICTIM OF BRIBERY OR CORRUPTION

It is important that you tell your line manager as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity. Any instances of bribery or attempted bribery should also be reported promptly to a director. If the bribery concerns your line manager, your concern may be reported directly to a director.

PROTECTION

Employees who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. Appris will support anyone who raises genuine concerns in good faith under this policy. Appris is committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Detrimental

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treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Managing Director. If the matter is not remedied, and you are an employee, you should raise it formally using the Appris Grievance Procedures.

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