

ANTI BRIBERY & CORRUPTION POLICY 2022



ELITE OFFICE FURNITURE UK LIMITED

Goole Office, Showroom & Factory

Elite Road
Goole
East Yorkshire
DN14 8BF
United Kingdom

Tel. +44 (0)1405 746000

Email. sales@elite-furniture.co.uk
www.elite-furniture.co.uk

London Office & Showroom

81-87 St John Street
Clerkenwell
London
EC1M 4NQ
United Kingdom

Tel. +44 (0)20 7490 4909


Email. londonshowroom@elite-furniture.co.uk

OUR ANTI BRIBERY AND CORRUPTION POLICY

ANTI BRIBERY AND CORRUPTION POLICY 2022

JOHN HULL
MANAGING DIRECTOR

SIGNED





POLICY STATEMENT

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate, implementing and enforcing effective systems to counter bribery.

We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. However, we remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both at home and abroad.

The purpose of this policy is to:

- (a) set out our responsibilities, and of those working for us, in observing and upholding our position on bribery and corruption; and
- (b) provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues.

Bribery and corruption are punishable for individuals by up to ten years' imprisonment and if we are found to have taken part in corruption we could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation. We therefore take our legal responsibilities very seriously.

We have identified that the following are particular risks for our business:

- Payments and gifts offered by subcontractors in order to secure jobs
- Requests from customers for payment to ensure that we secure contracts

To address these risks, we have issued all employees with a customer or subcontractor contact and a summarised copy of The Bribery Act 2010.

In this policy, third party means any individual or organisation you come into contact with during the course of your work for us and includes current or potential customers, suppliers, distributors, agents, advisers and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

WHO IS COVERED BY THE POLICY?

This policy applies to all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, casual workers and agency staff, interns, agents or any other person associated with us, or any employee within our subsidiaries (collectively referred to as Elite in this policy).

WHAT IS BRIBERY?

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

Examples:

Offering a bribe

You offer a client tickets to a major sporting event, but only if they agree to award the company a particular contract.

YOU have made an offence as you are making the offer to gain a commercial and contractual advantage. WE may also be found to have committed an offence because the offer has been made to obtain business for us. THE CLIENT may also have made an offence if the offer is accepted and not reported.

Receiving a bribe

A supplier gives your nephew a job, but makes it clear that in return they expect you to use your influence in our organisation to ensure we continue to do business with them.

The SUPPLIER has made an offence by offering a personal advantage in return for their commercial and contractual benefit. YOU would also be found to commit an offence if you accepted the offer for personal advantage.

GIFTS AND HOSPITALITY

Elite accepts normal and appropriate gestures of hospitality and goodwill, whether given to or received from third parties, so long as the giving or receiving of gifts meets the following requirements:

- (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 local law;
- (c) it is given in our name, not in your name;
- (d) it does not include cash or a cash equivalent (such as gift certificates or vouchers);
- (e) it is appropriate in the circumstances. For example, in the UK it is customary for small gifts to be given at Christmas time;
- (f) taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time;
- (g) it is given openly, not secretly; and
- (h) gifts should not be offered to, or accepted from, government officials or representatives, or politicians or political parties, without the prior approval of your manager.

The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift should always be considered.

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 a government official, agent or representative to "facilitate" or expedite a routine procedure;
 - (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 another employee who has refused to commit a bribery offence or who has raised concerns under this policy; or
 - (f) engage in any activity that might lead to a breach of this policy.

OUR ANTI BRIBERY AND CORRUPTION POLICY - continued

FACILITATION PAYMENTS AND KICKBACKS

We do not make, and will not accept, facilitation payments or ‘kickbacks’ of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. They are not commonly paid in the UK, but are common in some other jurisdictions.

If you are asked to make a payment on our behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt which details the reason for the payment. If you have any suspicions, concerns or queries regarding a payment, you should raise these with your line manager.

Kickbacks are typically payments made in return for a business favour or advantage. All Elite personnel must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.

DONATIONS

We do not make contributions to political parties. Donations will only be made to registered charities that are legal and ethical under local laws and practices. No donation must be offered or made without the prior approval of the Managing Director, Finance Director, and/or Sales Director.

YOUR RESPONSIBILITIES

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. All Elite Office Furniture Personnel are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your line manager, as soon as possible, if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. Our staff handbook indicates a number of ‘red flags’ that may indicate the possibility of being exposed to bribery or corruption.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with other Elite Office Furniture Personnel if they breach this policy.

RECORD-KEEPING

We must keep financial records and 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, which will be subject to managerial review.

You must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with our expenses policy and specifically record the reason for the expenditure.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

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

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.

It is important that you tell your line manager as soon as possible if you are offered a bribe by a third party, 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.



PROTECTION

Elite personnel who refuse to accept or offer a bribe or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption. Detrimental 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 immediately.

If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found within the staff handbook.

TRAINING AND COMMUNICATION

The communication of this policy is part of the induction process for all new staff. All existing personnel will receive regular, relevant training on how to implement and adhere to this policy.

Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

WHO IS RESPONSIBLE FOR THE POLICY?

The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. The Sales Director has primary and day-to-day responsibility for implementing this policy and for monitoring its use and effectiveness and dealing with any queries on its interpretation. Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy.

MONITORING AND REVIEW

The Managing Director monitors the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption. Staff members are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Managing Director.