



## **BRIBERY AND CORRUPTION POLICY**

### **1. Policy Statement**

It is Scutum UK Ltd’s policy to conduct all of our business in an honest and ethical manner. We take a zero tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity in all our business activities. We are also committed to enforcing effective systems to counter bribery and corruption.

This policy applies to all individual employees - directors, managers, account managers, engineering team leaders and engineers- whether temporary or permanent.

### **2. What is bribery and corruption**

A bribe is a financial or other advantage offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. Bribery or corruption is designed to influence an individual in their activity and usually causes them to be dishonest.

### **3. Gifts and Hospitality**

This policy does not prohibit the acceptance of normal and appropriate receipt of hospitality. In certain circumstances gifts and hospitality are unacceptable and our employees will not provide or receive gifts or hospitality with the intention to persuade or be persuaded to act improperly or influence performance of their normal duties.

### **4. Facilitation Payments and Kickbacks**

Our employees will not make and will not accept facilitation payments or kickbacks of any kind.

### **5. Donations**

Scutum UK Ltd does not make donations of any kind to political parties. No charitable donations will be made to gain commercial advantage.

### **6. Record Keeping**

Scutum UK Ltd keeps financial records and have controls in place which will evidence the business reason for making payments to third parties. All expenses claims relating to gifts, hospitality and expenses occurred to third parties must be marked with the reason for the expense and submitted to MD/Finance Director/Line Manager for approval under this policy.

### **7. Monitoring**

This policy is reviewed on an annual basis or at the monthly management meeting as required. Any changes or improvements will be implemented as required.

The policy is available to all employees and interested parties and can be found on our website.

John Bertram  
Managing Director  
Scutum UK Ltd

Date: 04 April 2022  
Review Date: 31<sup>st</sup> December 2022

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| <b>By my signature, I acknowledge that I have read, understood, and agree to the bribery and corruption Policy.</b> |
| Full Name:  |
| Position:   |
| Signature:  |
| Date:   |