

## **BRIBERY POLICY**

The Bribery Act 2010 which came into force in October 2011, was designed to tighten up bribery transactions in both the United Kingdom and abroad by UK companies and their employees. The penalties range from fines to imprisonment.

The Act was created to cover such offences as:

- **Bribing Another Person**
- **Being Bribed**
- **Bribing A Foreign Person Overseas**
- **Failing to Prevent Bribery**

It is not the intention of this document to define what a bribe is, but to give guidance as to what is acceptable at Brooksbank Valves Ltd. It is open to interpretation as to whether what was previously classed as corporate entertainment now falls under the Bribery Act. This policy applies to all permanent and fixed-term staff employed by the Company, any contractors, consultants and other persons, agents and distributors action under or on behalf of the Company.

No employee of Brooksbank Valves Ltd, whether acting personally or within the course of their business, will offer, promise or give a financial or other advantage to another person whom is a supplier, customer, potential customer or any other person connected with Brooksbank Valves Ltd, with a view to influencing that person.

No employee of Brooksbank Valves Ltd, whether acting personally within the course of their business will request, agree to receive or accept any financial or other advantage from any other person whom is a supplier, customer, potential customer or any other person connected with Brooksbank Valves Ltd, with a view to being influenced by that person.

The Act was not designed to prevent behaviour which is there to improve the relationship of business. Extreme care must be taken when offering or receiving any form of entertainment, gift, etc. Therefore, the following activities are deemed to be acceptable:

- Provision of a meal or other light entertainment as part of a meeting before and after the meeting, including drinks
- Provision of a meal or other light entertainment as part of their training or general meeting day
- Entertainment such as a golf day
- Small gifts such as pens, mugs, diaries, etc

The following rules will be followed by all members of staff employed at Brooksbank Valves Ltd:

1. No gifts will be offered or received over the value of £15 without the written permission of the Managing Director
2. All offers of entertainment will be approved by the Managing Director or a designated representative prior to being accepted or offered
3. Receiving or offering a meal or light refreshment is acceptable to a maximum value of £50 a head. Anything over the sum must be reported to the Managing Director

If any person is in doubt as to whether they should accept or offer any of the above then they are to seek advice from their Line Manager **prior** to the acts taking place.

Jonathan Brooksbank  
**Managing Director**

26 October 2017