



Anti-Bribery Policy

Byron Business Solutions Anti-Bribery Policy

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Introduction

Byron is committed to enforcing effective systems to counter bribery. It is the Company's policy to conduct all aspects of its business in an open, honest and ethical manner at all times.

This also applies to individuals working for the Company, including those providing services to the Company such as consultants, or contractors.

Our Aims

Our aims are to help the Byron conduct its business act in line with the Bribery Act 2010, to maintain the highest standards of business practice, and to advise staff, suppliers and others of the Company's 'zero-tolerance' to bribery.

UK Law

Under the Bribery Act 2010, bribery and corruption is punishable for individuals by up to ten years in prison. If Byron is found to have taken part in the corruption or doesn't have proper procedures to prevent it, it could face an unlimited fine and be excluded from Government contracts.

Our Policy

This policy applies to Byron staff and any contractors, consultants or others acting on behalf of the Company.

Byron will not:

- Make any kind of contribution for the purpose of gaining commercial advantage.
- Make, or accept, “bribes, bungs or kickbacks” of any kind.
- Provide gifts or hospitality with the intention of persuading anyone to act improperly, or to influence a public official in the performance of their duties.

Byron will:

- Keep records to evidence the business reason for any third party payments.
- Ensure anyone raising a concern about bribery doesn't suffer detriment as a result, even if they turn out to be mistaken.
- Encourage staff to raise suspicions or concerns about any malpractice at the earliest possible stage.

Staff Responsibility

Staff must not:

- Request a financial or other reward from any person in return for providing some favour.
- Accept any financial or other reward from any person in return for providing some favour.
- Offer any financial or other reward from any person in return for providing some favour.

Gifts and Hospitality

This policy does not prevent normal and appropriate hospitality nor the giving or receiving of small promotional items of low or nominal value.

Offering gifts:

Business gifts are mainly aimed at thanking customers and suppliers for their custom and loyalty, only small authorised gifts can be given.

Offering hospitality:

Company hospitality is mainly aimed at thanking customers and suppliers for their custom and loyalty. All hospitality events must have prior approval.

Receiving gifts:

Receiving promotional gifts of low value can be normal and appropriate. That said, gifts with a value higher than £25.00 cannot be accepted without approval. Any gift offered, even if refused because of its value, must still be reported to The Company.

Receiving hospitality:

The acceptance of corporate hospitality must be open and visible. Any invitations should be reported to the Company before acceptance. The following aspects are acceptable while attending conferences or seminars, sponsored by third parties.

- business and travel expenses incurred
- normal business lunches and meals

Donations to organisations:

No donations should be made to charities, political parties or other organisations without approval.

Non Compliance

Staff

Breaching Company policy may lead to disciplinary action in accordance with the Company's Disciplinary Policy.

Visitors

If the breach of policy arises from other organisations, or individuals, the Company will take appropriate action.

Monitoring Policy

The policy will be monitored on an on-going basis to ensure that it addresses issues effectively.

The following will be monitored:

- That all staff are advised of the policy.
- Assessment of any reported incident or occurrence.
- The policy itself to assess how effective the Company has been to maintain control.

Definitions

Bribe is a financial or other advantage offered or given to anyone to persuade them to or reward them for performing their duties improperly, or, with the intention of influencing them in the performance of their duties.

Hospitality is the practice of being hospitable, this includes the reception and entertainment of guests / visitors.

Kickbacks or facilitation payments are typically small payments made in return for a business favour or advantage.

Reviewing Policy

This policy will be reviewed and, if necessary, changed following legislative or organisational changes. Improvements will be made by learning from experience and the use of an established regular review.

Policy Amendments

Should any amendments, revisions, or updates be made to this policy it is the responsibility of the Company senior management to see that all relevant employees receive notice. Written notice and/or training should be considered.