

Policy



Anti-Bribery Policy

1. Purpose

John Nixon Ltd is committed to upholding responsible and fair business practices in relation to all of its business activities and operates a zero-tolerance policy towards bribery and corruption.

The purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery and corruption regulations and to ensure that the company's business is conducted in a socially responsible manner.

2. Policy statement

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal or a breach of trust. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

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. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery and corruption.

It is not acceptable to give, promise 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. It is also not permitted to accept a payment, gift of hospitality from a third party that you know, or suspect is offered or provided with the expectation that it will achieve a business advantage for them.

We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate.

3. Scope

Who is covered by the policy?

This policy covers all workers including employees, both permanent and fixed term, consultants, agency workers and volunteers (collectively referred to as workers in the policy).

In this policy, third party means any individual or organisation our workers come into contact with during the course of their employment and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, government and public bodies, including their advisors, representatives and officials.

3.2 Bribes

Workers must not engage in any form of bribery, either directly or through any third party (such as an agent or distributor).

3.3 Gifts and hospitality

The giving of business gifts to a third party is permitted provided the following requirements are met: -

- The gift 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
- It is given in the company name, not the givers personal name
- It does not include cash or a cash equivalent (such a gift vouchers)
- It is of an appropriate and reasonable type and value and given at an appropriate time
- It is given openly, not in secret
- It is approved in advance by a Line Manager

Hospitality or entertainment may only be accepted if: -

- Workers or personnel from the supplier are in attendance
- The supplier does not pay any accommodation or (more than trivial) travel expense for Nixon Hire workers
- The entertainment and/or acceptance of it could not be interpreted as a reward, inducement or encouragement for a favour or preferential treatment and
- It is not unduly lavish or extravagant

3.4 Political contributions

We do not make donations, whether in cash or kind, in support of any political parties or candidates, as this can be perceived as an attempt to gain an improper business advantage.

3.5 Charitable contributions

Charitable support and donations are acceptable. However, workers must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery.

We only make charitable donations that are legal and ethical. No donation must be offered or made without the prior approval of a line manager.

4. 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 workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Workers are encouraged to raise concerns about any issue or suspicion of corruption at the earliest opportunity. Anyone who is unsure whether a particular act constitutes bribery or corruption should raise this via their line manager

A breach of any of the provisions in this policy may constitute a disciplinary offence and will be dealt with in accordance with the company's disciplinary procedure

5. 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 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.

6. What to do if you are a victim of bribery or corruption

You should immediately report to your line manager 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.

8. Protection

Workers 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, 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 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 contact the HR department.

9. Training and communication

The company's zero tolerance approach to bribery will be communicated to all new workers as a part of the induction process. All existing workers will receive relevant updates on how to implement and adhere to this policy.

The company's Anti-Bribery Policy is communicated to all third parties via our website at www.nixonhire.co.uk

10. Who is responsible for the policy?

The Managing Director has overall responsibility for ensuring this policy complies with our legal and ethical obligations and that all those under our control comply with it.

Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate training on it.

11. Monitoring and review

Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption. Any improvements identified will be made as soon as possible.

This policy does not form part of any worker's contract of employment and it may be amended at any time.