

QUALITY INSTRUCTION	REVISION No.	TITLE
QCD 231	01	Anti-Bribery, Corruption, Slavery & Business Ethics Policy

This document is comprised of 6 pages.

CHANGE AMENDMENT HISTORY			
Rev No	Details of Change	Authorised by	Date Authorised
01	Compiled to suit requirements of AS9100	D. Kiss	26/09/11

Introduction

The Bribery Act 2010, came into effect on 1 July 2011. The Act aims to promote anti-bribery practices amongst businesses. Companies or organisations will be committing a criminal offence, if they fail to prevent bribery that is intended to obtain or keep business, or an advantage in the conduct of business for the Company or organisation. This policy is intended to support a culture of openness, trust and integrity, in all we do.

As a Company and a Group of businesses we are committed to conduct our operation according to rigorous ethical, professional and legal standards and to address the risks of bribery or corruption, demonstrating that we have clear practical policies and procedures in place, to comply with the Act.

Harlow Group Limited is committed to implementing and enforcing effective systems to counter bribery and corruption. It is therefore the Company’s policy to conduct all aspects of its business in an honest and ethical manner at all times.

This policy applies to all individuals working for the Company, including anyone providing services to the Company such as suppliers, consultants, or contractors.

There are 2 general offences regarding bribery and corruption:

The first covers the offering, promising, or giving of a bribe – this is classed as ‘active bribery’.

The second covers requesting, agreeing to receive, or the accepting of a bribe. This is classed as ‘passive bribery’.

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The Act:

- Incorporates a corporate offence of failure to prevent bribery by anyone working on behalf of a business. As a Company we can be convicted if we fail to demonstrate that we have adequate procedures in place to prevent bribery
- Makes it a criminal offence to give, promise or offer a bribe or agrees to receive or accept a bribe, either at home or abroad
- Increases the maximum penalty for bribery from 7 to 10 years imprisonment, with an unlimited fine.

To ensure this is interpreted correctly, the Act does not cover genuine promotional and other business expenditure such as tickets for sporting events, promotional gifts or reasonable hospitality.

There are 6 principles of the Act. Although these are not prescriptive, they are intended to allow flexibility. They take into account the variety of circumstances and the size of organisations:

Proportionality

The action taken is in proportion to the risk and the size of the organisation.

Top level commitment

Those in senior positions are made particularly aware of the risks to the business and best placed to ensure the organisation conducts business without bribery.

Risk Assessment

Harlow Group have minimal risk of bribery, but thorough assessments highlights the nature or extent of exposure to bribery.

Due Diligence

We approach business relationships with a risk based approach to those whom we deal with, or who provide services to us.

Policy Aim

The aim of this policy is to help the Company act in accordance with the Bribery Act 2010, maintain the highest possible standards of business practice, and advise individuals of the Company's 'zero-tolerance' to bribery.

The Law

Under UK law (UK Bribery Act 2010), bribery and corruption is punishable for individuals by up to ten years imprisonment. If the Company is found to have taken part in the corruption or lacks adequate procedures to prevent Bribery, it could face an unlimited fine and be excluded from tendering for Government contracts.

Policy Statement

This policy applies to all permanent and fixed-term staff employed by the Company, and any suppliers, contractors, consultants or other persons acting under or on behalf of the Company.

The Company will not:

- Make contributions of any kind with the purpose of gaining any commercial advantage
- 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
- Make, or accept, "kickbacks" of any kind

The Company will:

- Keep appropriate internal records that will evidence the business reason for making any payments to third parties

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- Encourage employees to raise concerns about any issue or suspicion of malpractice at the earliest possible stage
- See that anyone raising a concern about bribery will not suffer any detriment as a result, even if they turn out to be mistaken

Employee Responsibility

Employees must not:

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

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.

Gifts and Hospitality

This policy does not prohibit giving and receiving promotional gifts of low value, or normal and appropriate hospitality.

Receiving Business gifts:

- Receiving promotional gifts of low value is normal and appropriate, however, gifts with a value exceeding £25.00 may not be accepted without approval. Any gift offered and then refused because of its value, must be reported to the Company.

Offering Business gifts:

- Business gifts are primarily aimed at thanking customers and suppliers for their custom and loyalty, only authorised gifts may be given.

Receiving Hospitality:

The acceptance of corporate hospitality must be transparent; all invitations must be reported to the Company before an employee accepts any invitation. The following areas are exempt while attending conferences, seminars, sponsored by third parties.

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

Offering gifts and hospitality:

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

Donations to organisations:

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

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Non Compliance Employees

Failing to observe Company policy may lead to disciplinary action in accordance with the Company's Disciplinary Policy

Visitors

In the event of a breach of the policy by other organisations, or individuals, the Company will take appropriate action.

Ethics and Ethical Behaviour

Harlow Group ensures its business is conducted according to rigorous ethical, professional and legal standards. It ensures all managers and employees have a detailed understanding of the business's minimum standards of operation and the expectations of our customers and suppliers.

To achieve this goal, all employees are expected to:

- Adhere to this policy in their professional, as well as their personal conduct
- Treat co-workers with respect, courtesy, honesty and fairness
- Respect different values, beliefs, cultures and religions
- Value the contribution of the people they work with
- To not bully, intimidate, harass or discriminate against co-workers

Confidentiality of Information

During employment with the Harlow Group, employees are entrusted with confidential information with regard to the Company, its customers and suppliers.

The disclosure of confidential information to any third party during, or after employment, is not permitted unless the disclosure has been properly authorised.

Where required, the Harlow Group will expect its employees to read, acknowledge and sign any confidentiality agreement that mentions any terms and conditions the Harlow Group has, relevant to the treatment of confidential information, including intellectual property of the Harlow Group. (Refer to contract of employment).

Harassment

Harassment may be defined as unwanted behaviour which a person finds intimidating, upsetting, embarrassing, humiliating or offensive. Harlow Group will provide a work environment that is free of inappropriate behaviour of any kind, on account of age, physical disability, marital status, race, religion, sex, or sexual orientation.

Employees are responsible for supporting Harlow Group in its endeavour to protect others from any form of harassment.

Should an employee believe that they have been harassed, the matter should be raised with the Human Resources department where it will be investigated without delay. (See full Company policy)

Alcohol and Substance Abuse

The use or possession of alcohol, or illegal drugs, or being under the influence of these substances during working hours, is strictly prohibited.

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Conflicts of Interest

Each employee is expected to avoid situations in which their financial or other personal interests or dealings are, or may be, in conflict with the interests of Harlow Group. Accordingly, Harlow Group expects employees to act in Harlow Group’s best interests at all times.

Employees are advised not to engage in any other business, commercial or investment activity that may conflict with their ability to perform their duties for Harlow Group.

Employees must not use any company property, information or position for personal gains or to tarnish the image of the company.

For avoidance of doubt, seek advice from your Manager. (Also see contract of employment)

Social Networking

Employees shall not reference, or engage in social networking activity which may expose Harlow Group to legal, or reputational risks, or the safety or security of its employees, customers or suppliers. (See Company policy).

Treatment of Customers

Trust and confidence between Harlow Group and our customers is vital. All employees should strive to consistently deliver an excellent service when dealing with customers.

Accurate understanding of the customer requirements and Harlow Group’s obligations depend on open and clear communication when dealing with the customer.

Treatment of Suppliers

Harlow Group ensures that all Harlow Group employees are treated fairly, with dignity and respect. Our suppliers are also entitled to fair treatment. It is our intention to provide accurate, open and honest communication with our suppliers, whilst maintaining the interests of Harlow Group and our customers.

Fraud

Fraud, or the act, or intent to cheat, trick, steal, deceive, or lie, is both dishonest and in most cases, criminal. Intentional acts of fraud are subject to disciplinary action, including dismissal of the employee concerned. (See full Company Disciplinary policy).

Monitoring Policy

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

The following points must be enforced:

- All individuals working for the Company must be advised of the policy.
- Assessments must be carried out of any reported incident or related occurrence. Monitoring of the policy is essential to assess how effective the Company has been to establish control of its obligations.

Monitoring and Review of Policy

This policy may be reviewed and, if necessary, revised to comply with current legislative or organisational changes. The policy may be reassessed to ensure the risks are contained and improvements made by learning from experience.

If you are approached, or are in doubt as to whether you are being offered a bribe, either by an internal source, or externally, you should discuss this in confidence with a member of the HR department, to clarify the situation before proceeding with any acceptance or relationship or request from clients.

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Policy Amendments

Harlow Group reserves the right to amend the content of this policy as necessary. The Company understands the information provided is only a guide to good practice; it is up to each employee to see that it meets the need of their particular circumstances.

Anti-Slavery Policy Statement

It is the policy of Harlow Group to conduct all of its business in an honest, transparent and ethical manner. This includes ensuring effective systems and controls are in place to minimise the risk of slavery and human trafficking taking place in our business operations or supply chains. We take a zero-tolerance approach to modern slavery and human trafficking within Harlow Group and its supply chains, and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate.

This anti-modern slavery and human trafficking statement which is available to all of its colleagues on the company's intranet site. As part of our commitment to ensuring a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business.

Harlow Group will continue to review its processes and procedures with our suppliers to ensure potential risks in our supply chains are identified, assessed, mitigated and monitored.

New and existing suppliers are required by Harlow Group to complete a detailed questionnaire and also to provide evidence to show compliance with the Modern Slavery Act ('Act').