

**Head Office**

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0800 043 3241

## Anti-Corruption and Bribery Policy

Creative Office Solutions LTD (the Company) takes a zero-tolerance approach to corruption and bribery and is fully committed to conducting its business in an honest and ethical manner. The Company recognises that it is imperative to prevent any form of bribery and/or corruption in its practices, and to ensure that it acts with professionalism, fairness, and integrity in all of its business proceedings and relationships. The Anti-Corruption and Bribery Policy outlines how the company will maintain ethical standards and counter any and all forms of bribery in the workplace.

In this policy, 'bribery' refers to an inducement or reward offered, promised or given with the intention of improperly gaining any commercial, contractual, regulatory or personal advantage, which could be considered an offence under the Bribery Act 2010 (the Act), such as:

- Offering or giving a bribe
- Accepting or requesting a bribe; or
- Bribing a foreign public official

This policy applies to all individuals (Workers) working for or on behalf of the company, including:

- Permanent, fixed term, or temporary workers
- Consultants
- Contractors
- Seconded staff
- Casual staff
- Agency staff
- Volunteers
- Agents
- Sponsors
- Third parties (any individual or organisation/company that Workers come into contact with whilst conducting company proceedings)

### Gifts and Hospitality

This policy does not prohibit appropriate gifts and/or hospitality given or received between the company and a third party. However, the following guidance must be followed by Workers when giving and receiving gifts and/or hospitality in order to abide by U.K. legislation and to ensure that appropriate and professional business relationships are being maintained.

Giving and/or receiving gifts and/or hospitality is permitted in lines with the following regulations:

- Must not be made with the intention of influencing a Worker or Third Party to obtain or retain business or business advantage, or as a reward for obtaining favours or benefits.
- Must comply with local law in all relevant countries.
- Must be given on behalf of the company, not an individual.
- Must not include cash or a cash equivalent.
- Must be appropriate under the circumstances and be of an appropriate type, value, and time given or received. These factors must be considered when taking into account the reasoning for giving and/or receiving a gift and/or hospitality.
- Must be given/received openly and not secretly.
- Gifts must not be given or accepted from government officials/representatives, or politicians/political parties, unless prior approval has been given by either the company's Anti-Bribery Compliance Partner, the Compliance Officer for Legal Practice (COLP) or Compliance Officer for Finance and Administration (COFA)

### Worker Responsibilities

It is important for all Workers to understand what is acceptable and what is not under the policy, which is made available to Workers at all times. The responsibility of the Worker are as follows:

- To not give, promise, or offer, a payment, gift and/or hospitality with the expectation or hope that they/the Company will be improperly given a business advantage, or as a reward for business advantage already having been improperly given.
- To not give or offer a gift and/or hospitality to a government official, representative or agent to facilitate or expedite a routine procedure.
- To not accept any gifts, hospitality, or payment from a Third Party, where it is suspected that the Third Party will obtain business advantage from the Company as a result.
- Must not encourage another Worker to engage in improper business exchanges, or threaten or retaliate against another Worker who has refused to commit a bribery offence or who has raised concerns over a potential bribery offence under this policy.
- To remain vigilant in detecting and preventing bribery and other forms of corruption. It is the duty of any Worker who suspects that a breach of this policy is taking place to immediately report their concerns to management.
- To understand that any breach of this policy may result in disciplinary action, which could lead to dismissal for gross misconduct.

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**Company Commitments**

The Company also understands that it may be held liable under the Act if it fails to prevent bribery by an associated person (including, but not limited to Workers) for the Company's advantage. The commitments of the Company are as follows:

- To ensure that training on this policy is provided for all Workers is given and that the Company's zero-tolerance stance on bribery and corruption is clearly communicated and understood by all Workers, and, where appropriate; clients, contractors, and business partners.
- To regularly monitor the effectiveness of this policy and ensure that it is being executed adequately and appropriately. The Company is also responsible for any improvements that can be made in preventing and countering bribery and corruption are identified and implemented as soon as possible.
- To keep appropriate financial records which evidence the business reason for gifts, hospitality and payments made and received.
- To ensure that the Company only makes charitable donations and provides sponsorships that are legal and ethical under local laws.

The Creative Office Solutions LTD Anti-Corruption and Bribery Policy is issued in compliance with requirements of the Bribery Act 2010. The policy is made available to employees and will be reviewed and revised on an annual basis.

Signed : *N. Owen*

Nick Owen

Managing Director

22/02/223