



bdm

GROUP

Anti-Bribery and Corruption Policy

Version Control

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Issue History

When minor amendments are made to the document, the version number should increase after the point (0.1, 0.2, etc.). When major amendments are made, it should increase before the point (1.0, 2.0, etc.).

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| 2.0 | 15/09/2022 | Wendy Burgess | Reference to Risk Register and Non-Conformance Log | |
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1. Introduction

The BDM Group Ltd and every subsidiary (“Company”) value honesty, integrity, transparency, and professionalism in dealings with clients, suppliers, competitors and customers alike.

BDM is committed to applying the highest standard of ethical conduct and integrity in its business activities.

BDM is committed to countering bribery and corruption in all parts of our business.

2. Aim of Policy

The aim of this policy is to communicate BDM Group’s values, philosophy, and ethos on the issue of bribery and corruption. It is intended to help employees understand their responsibilities, recognise and deal with bribery and corruption issues.

Our anti-bribery and corruption policy is a set of general guidelines that outline BDM’s stance, approach and plan for tackling bribery and corruption internally and in all the dealings and relationships that we have with third parties.

3. Scope of the Policy

The primary UK legislation in relation to bribery and corruption is the [Bribery Act 2010](#) which came into force on 1 July 2011.

BDM is committed to ensuring it has the relevant processes and procedures in place to prevent bribery taking place. BDM is committed to tackling any instances of bribery or corruption should they occur.

Every Officer, employee (at any level) and individual acting on the Company’s behalf is responsible for maintaining the Company’s reputation and for conducting business honestly and professionally.

The policy is also applicable to our business partners and third parties.

4. Policy Statement

BDM Group considers that bribery and corruption have a detrimental impact in business by undermining good governance and distorting free markets. The Company benefits from carrying out business in a transparent and ethical way.

The Company does not tolerate any form of bribery, whether direct or indirect, by, or of, its employees, officers, agents or consultants or any person or companies acting for it or on its behalf.

The board and senior management are committed to implementing and enforcing effective systems to prevent and eliminate bribery, in accordance with the Bribery Act 2010.

5. Managing the Policy

Everyone must comply with this policy.

The policy is owned by the CEO – Mike Surridge.

Mike Surridge and the board will review the policy annually or in the instance of legislative changes – whichever is soonest.

The Senior Management is responsible for reviewing and implementation of the policy.

The risk of bribery and corruption is documented on the company Risk Register and any breaches will be documented in the Non-conformance Log.

The Company has a policy of not conducting business with service providers, agents or representatives that do not support appropriate anti-bribery and corruption objectives.

6. General Policy Principles

This policy as per the Bribery Act 2010 covers the following bribery offences applicable to our operations:

- **Bribing Another Person** – For example, offering, promising, or giving a financial or other advantage; intending to induce or reward the improper performance of a relevant function or activity or knowing that accepting the advantage is improper
- **Being Bribed** – For example, requesting, agreeing to receive, or receiving a financial or other advantage; intending a relevant function or activity to be improperly performed or rewarding improper performance or where accepting the advantage is improper
- **Senior Officer Offence** – For example, the corporate body has bribed or has been bribed; the senior officer has consented to or connived in the bribery
- **Failure to Prevent Bribery** – For example, a person associated with a commercial organisation, bribes someone else; intending to obtain or retain a business advantage for the organisation; the organisation did not have in place “adequate procedures”

A bribe is a financial advantage or other reward that is offered to, given to, or received by an individual or company (whether directly or indirectly) to induce or influence that individual or company to perform public or corporate functions or duties improperly.

Employees and others acting for or on behalf of the Company are strictly prohibited from making, soliciting, or receiving any bribes or unauthorised payments.

As part of its anti-bribery measures, the Company accepts transparent, proportionate, reasonable, and bona fide hospitality and promotional expenditure, whether given or received.

This Policy applies to all employees, and they are required to familiarise themselves and comply with this Policy.

7. Procedure for Concerns and Non-Compliance

The success of the Company's anti-bribery and corruption measures depends on all employees, and those acting for the Company playing their part in helping prevent bribery. Therefore, all employees and others acting for, or on behalf of, the Company are encouraged to report any suspected bribery in accordance with the procedures set out in the Policies or in the case of third parties to the Company Secretary. The Company will support any individuals who make such a report in good faith.

The first point of contact for advice is the employee's immediate manager. The manager will take ownership of the advice and seek further clarification and escalate as per the company management structure (see Staff Handbook) as required.

A breach of this Policy by an employee will be treated as grounds for disciplinary action (See Staff Handbook).

Employees and other individuals acting for the Company should note that bribery is a criminal offence that may result in up to 10 years' imprisonment and/or an unlimited fine for the individual and an unlimited fine for the Company.

8. Implementation of the Policy

Communications

- Making available a copy of the policy to prospective applicants
- Ensuring all new starters can discuss the policy with line managers/ colleagues
- Making use of team meetings to discuss the policy and defining areas where practice could be improved
- Providing training to all Senior and Line Managers
- Including reference to abiding by the policy in staff terms and conditions
- Incorporating specific responsibilities into job/role descriptions

Monitoring the Policy

This policy will be monitored to judge to what extent it is working and identify areas for improvement.

Monitoring will relate to every Officer, employee (at any level) and individual acting on the Company's behalf.

Effective monitoring is an important tool for measuring performance and progress towards adherence to the relevant legal and legislative requirements within this Policy.

Information collected is analysed and used to inform appropriate action. Monitoring will only generate meaningful and reliable results when employees feel safe and confident in raising concerns relating to bribery and corruption and when they feel assured that meaningful action will follow.

BDM has taken steps to reassure staff on issues of confidentiality through their communications.

9. Review

This policy will be reviewed annually by the Board of Directors to ensure that it remains up to date and reflects the needs and practices of the organisation.

The policy may also be reviewed if legislation changes or if monitoring information suggests that policy or practices should be altered.

