

I & H Brown values its reputation for ethical behaviour and for financial probity and reliability. It recognises that over and above the commission of any crime, any involvement in fraud and/or bribery will also reflect adversely on its image and integrity. Its aim therefore is to limit its exposure to fraud and bribery by setting out a clear Anti-Fraud and Bribery Policy. This will be done by training all employees so that they can recognise and avoid fraudulent activities and/or the use of bribery by themselves and others. The Company will take firm and vigorous action against any employee involved in fraudulent/bribery activities as described in this Policy.

If you bribe or attempt to bribe another person, intending either to obtain or retain business for the Company, or to obtain or retain an advantage in the conduct of the Company's business this will be considered gross misconduct. Similarly, accepting or allowing another person to accept a bribe will be considered gross misconduct. In these circumstances, you will be subject to formal investigation under the Company's disciplinary procedures and disciplinary action up to and including dismissal may result.

**Bribery:** the offering, the giving, the solicitation or the acceptance of any bribe, whether cash or other inducement *to or from*

- Any person or company, wherever they are situated and whether they are a public official or body or private person or company – by
- Any individual employee, agent or other person or body acting on the company's behalf – in order to
- Gain any commercial or contractual advantage for the company in a way which is unethical – or
- Gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual

**Fraud:**

- Misappropriation or misuse of assets for personal benefit
- Any involvement in blackmail or extortion
- Accepting or offering an inducement to or from a third party, which could be considered an illegal transaction
- False accounting and/or making fraudulent statements i.e. False overtime claims and expenses
- Collusion between bidders in a tender competition to favour a particular bidder
- External fraudulent activities against an organisation.

The Company will establish and maintain strict adherence to internal control procedures to prevent fraud/bribery; personnel are required to act at all times with honesty and integrity in all of their business dealings on behalf of the Company; regular review of our policy and procedures; establish, maintain and develop appropriate software systems and documentary control; all tenders will be reviewed on a regular basis.

This policy is not meant to prohibit the following practices providing that they are customary in a particular market, are proportionate and are properly recorded, where appropriate. This will include normal and appropriate hospitality, including gifts and entertainment; the giving of a ceremonial gift on a festival or at another special time; the offer of resources to assist the person or body to make the decision more efficiently provided that they are supplied for that purpose only.

**Gifts:**

- No employee may give, or accept, gifts without prior approval from their Manager. Where the gift is in excess of £500, approval must be sought from a Director.
- No gift of cash/cash equivalent may be accepted or offered without the prior approval of their Manager or Director.
- Gifts in excess of £500 should be recorded in the Company's Gifts and Entertainment Register.

**Entertainment/Hospitality:**

- No employee may accept or offer any entertainment or hospitality without prior approval from their Manager. Where the entertainment or hospitality is in excess of £500, approval must be sought from a Director.
- All entertainment/hospitality valued in excess of £500 should be recorded in the Company's Gifts and Entertainment Register

The Company's Gifts and Entertainment Register will be held by the HR Manager and be reviewed regularly by the Main Board of Directors to assess frequency and value. The prevention, detection and reporting of fraudulent/bribery activities is the responsibility of all employees via the Company's Whistleblowing Procedure.

To maintain best working practices the Company reviews this policy when necessary to reflect changes in legislation and industry standards and all Company policies are reviewed by the Board of Directors annually in June each year.