



Showpiece Design Limited, Tithe Barn Home Farm, Sulham Lane, Pangbourne, Berkshire, RG8 8DT

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## ANTI-BRIBERY AND WHISTLE BLOWING POLICY

### Introduction

We are committed to delivering services and carrying out business operations in an ethical, open and transparent manner.

We always work hard to build and maintain a longstanding and unquestionable reputation for our positive

behaviour and integrity. This reputation is based on our zero-tolerance approach to any questionable behaviour which may place in doubt the company's values and conduct.

As well as the conduct of our own employees, this policy also relevant to third parties who provide works and services on our behalf such as Subcontract and Supply chain partners.

It is our expectation that those parties adhere to or provide equivalent policies and procedures in relation to tackling issues of bribery and corruption within the work place.

### The Policy

We under no circumstances do we tolerate **any form** of bribery or corruption.

No person who comes under the scope of the policy must offer, to pay, make, seek or accept a personal payment, gift or favour in return for favourable treatment or to gain any business advantage. It is a criminal offence to do so.

All business activities undertaken by the Company must adhere to and comply with any government legislation set out (The UK Anti Bribery Act 2010). All subsequent revisions of legislation must be complied with.

The Company will take firm action against any individuals or other parties that it discovers are involved in bribery.

Any breach of the Policy by employees will result in disciplinary action under the Gross Misconduct provisions of the Company's Disciplinary and Dismissal Procedures which can include the sanction of summary dismissal in any case where an employee has been found to have paid or received a bribe.

The guidelines below set out the Company's clear and unequivocal stance with regards to bribery and the acceptance of gifts from colleagues, clients or third parties:

Employees and representatives of the Company:

- Shall not offer, promise or pay bribes;
- Shall not request, agree to or accept bribes;
- Shall not make payments to someone (or favour them in any other way) if they know that it will involve
- someone in misuse of their position (or them performing their functions improperly);
- Shall not misuse their position (or perform your functions improperly) in-connection-with payments (or
- other favours) for themselves or others;
- Shall not deliberately use advantages to try to influence public officials for business reasons.

Further guidance may be obtained by referring to the UK Anti Bribery Act 2010.

The objective of this Policy is not to prohibit the giving or receiving of reasonable and proportionate gifts and hospitality.

However, employees must declare and keep a record of hospitality or gifts accepted or offered, which will be subject to managerial review to ensure they are fully compliant with the policy.

### Policy Procedures

**Communication** - We will communicate this policy and relevant guidance to employees across the Company, through our established internal communication channels. We will also communicate this policy to our suppliers, contractors and business partners and wider stakeholders.

**Training** - We will ensure that those within the scope of the policy receive training appropriate to their activities and the associated risks.

**Data Retention** - We will maintain adequate books and records which properly and fairly document all financial transactions. We will maintain written evidence to record compliance with this policy.

**Audit** - Our internal control systems will be subject to regular internal and independent audit to provide assurance that they are effective in countering bribery and corruption.

**Business relationships** - We will ensure that our business partners – including contractors, suppliers, agents, brokers and joint venture partners –are fit to do business with.

**Supply chain** - We will address bribery and corruption risk in our supply chain, for example by ensuring that payments made for goods and services are reasonable.

**Conflicts of interest** - We will address conflicts of interest and the risks created by gifts and hospitality through the implementation of our internal policies.

### Whistle Blowing

Understandably, employees may be worried about raising these types of issues and may consider keeping these concerns to themselves. If an employee raises a genuine concern under this policy, we will ensure that they will not be at risk of losing their job or suffering any form of retribution as-a-result.

We understand employees may wish to raise a concern in confidence, if we are asked to protect the person's identity we will not disclose their identity without prior consent.

### Raising a concern internally

If an employee has a concern, we hope they would normally be able to raise this with their line manager either verbally or in writing. If they feel they cannot raise the concern with their line manager or if it appears nothing is being done with regards to their concern they should contact the Managing Director.

If the channels above have been followed and the employee still has concerns or if they feel that the matter is so serious they are unable to discuss it with any of the individuals mentioned above, they should contact the HR representative.

All concerns will be investigated and reviewed. This will involve a formal investigation and formal procedure and outcome.

### Raising a concern externally

We would hope that the policy gives employees the assurance needed to raise matters internally however there may be circumstances when they may need advice or assistance prior to reporting any issues externally (ie regulators or Police).

Public Concern at Work (PCAW) are a free, confidential and practical helpline that provided practical advice if an employee is unsure of whether or how to raise a concern about danger or illegality that they have witnessed at work.

Helpline Number: 020 7404 6609 Or [helpline@pcaw.co.uk](mailto:helpline@pcaw.co.uk).

## Monitoring and review

The Company is responsible for engaging Internal Audit to independently assess compliance with this policy.

An annual audit will be carried out annually on compliance with this policy to the Senior Management Teams, which will make an independent assessment of the adequacy of the policy and disclose any material noncompliance. The Company may also make an independent assessment of the adequacy of the policy in response to an event such as an instance of bribery.

**Signature:** \_\_\_\_\_ **Date:** 24<sup>th</sup> January 2017

**Name:** Deanne White **Position:** Director

### Version Control

Issue	Description	Change Date	Made By	Approved	Approval date
1.0	Policy Statement			Yes	24/01/2017
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