

## **Anti-Bribery Policy**

### **Introduction**

MiCiM Ltd ('the Company') aims to ensure all its business affairs are conducted in an ethical and honest manner. The Company has a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all of its business dealings and relationships and implementing and enforcing effective systems to counter bribery.

The Bribery Act 2010 is important to all employees of MiCiM Ltd because if an employee is deemed to be guilty of an offence under this legislation, it could lead to summary dismissal for gross misconduct under the Company's Disciplinary Procedure. If the Company were also found to have acted negligently in respect of trying to prevent bribery in the organisation, then the company and its Directors could be subject to criminal sanctions including unlimited fines and imprisonment.

### **Policy**

This policy aims to increase your awareness of the Company's position on preventing and prohibiting bribery in accordance with the Bribery Act 2010.

This policy applies to all employees of MiCiM Ltd as well as agency workers, temporary workers, contractors and any third party with whom you may come into contact with during the course of your work. Third parties may therefore include current and potential clients, customers, suppliers, distributors, advisers, business contacts and government and public bodies.

### **What is a Bribe?**

A bribe is an inducement or reward offered, promised or provided in order to gain a commercial, contractual, regulatory or personal advantage.

The Company prohibits employees or associated persons from offering, promising, giving, soliciting or accepting any bribe.

### **Receiving Gifts and Corporate Hospitality**

The Company recognises that gifts and hospitality can be an important part of developing relationships with business contacts. Gifts are usually given as a mark of appreciation. You must make Alison Newell, Head of Business Operations aware of any gifts or hospitality offered to you.

Hospitality is a way of building upon existing relationships or creating new ones. It may include entertaining, meals, receptions, tickets to entertainment, social or sports events with the purpose of initiating or developing relationships with business contacts, for example. Please remember that if you accept such forms of hospitality, the host should always be present, otherwise it is a gift. Accepting lavish, extravagant or repeated hospitality could easily be misinterpreted by third parties. Please review the appropriateness of any invitation with Alison Newell before accepting.

As a general rule, small tokens of appreciation, for example flowers or a bottle of wine, may be retained by employees. You may not however without prior consent of Alison Newell accept any gifts, favour and/or offer of hospitality of whatever kind to a value of more than £50 from any customer, client or supplier of the Company or any prospective customer, client or supplier of the Company. Any breach of this is considered an act of misconduct under the Disciplinary Procedure.

If you believe that the gift or hospitality may exceed the £50 limit outlined above, you will need to complete an authorisation form and send this to Alison Newell for review (Appendix 1).

## **Providing Gifts and Corporate Hospitality**

In some cases, it may be acceptable to provide a gift to a customer or business contact. Before doing this, please give consideration as to how this may be perceived by the recipient. For example, you should consider whether there may be any possible suggestion of undue influence upon a client or business contact before making a gift and also whether the provision or acceptance of the gift may contravene the recipient's own internal policies. There may also be tax implications if the value of the gift is over a certain amount.

The Company will authorise reasonable and proportionate hospitality events which are arranged in good faith as part of our normal client and business relationship development practices. However, if you provide hospitality which is lavish, provided frequently, especially to the same individuals, or leaves the recipient in a position of obligation, this may lead us to question this further with you to determine if you have exceeded the scope of the policy.

Please remember never to:

- Give, accept, offer or promise a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already received.
- Threaten or retaliate against another individual who has refused to commit an offence or who has made an allegation of wrongdoing.
- Engage in any activity that might lead to a breach of this policy.

## **Providing Gifts or Corporate Hospitality Process**

In order to protect yourself and the Company from allegations of bribery you must complete an authorisation form (Appendix 2) for any gift or hospitality you wish to give, up to a maximum value of £50 per recipient. This form must be authorised by Alison Newell prior to any gift being purchased or any hospitality being arranged.

## **Contract Negotiations**

Those employees responsible for negotiating supplier contracts must always ensure that they negotiate the contract in a way that is in the best interests of MiCiM Ltd and not for any personal gain. Any personal advantage must be declared openly as part of the supplier proposal and must not be a factor in deciding which supplier to award the contract to.

## **Reporting Allegations of Bribery**

MiCiM Ltd are committed to acting in a professional manner and promoting an anti-corruption culture within all areas of the business. Should you believe that a fellow employee is giving or receiving bribes then you must notify a Company Director, as soon as possible so that these allegations can be investigated further. All allegations of bribery will be investigated thoroughly. This may lead to disciplinary action, up to summary dismissal for serious cases deemed to be gross misconduct. All employees, where appropriate, will be required to co-operate in any investigation into possible or suspected bribery.

If you are asked by a client or supplier for gifts, hospitality or anything else which you believe would constitute a bribe under the policy definition then you must report the incident to a Company Director immediately. Your allegations will then be investigated further and action taken as appropriate.

## **Policy Responsibilities**

The Managing Director has overall responsibility for ensuring this policy complies with all requirements of the Bribery Act 2010.

Every manager will be responsible for ensuring that their employees are adhering to this policy and Alison Newell will monitor and review all hospitality bills and gift or hospitality offers from suppliers to ensure compliance.

All employees should report any gifts and/or hospitality offered and accepted by themselves to Alison Newell who will keep accurate, detailed and up to date records, including those not requiring to be authorised.

### Receiving a Gift / Hospitality Authorisation Form – Appendix 1

This form is to be used in order to obtain authorisation for the acceptance of any gift or hospitality offered in excess of £50 (inclusive of VAT). This form will be kept as evidence of due diligence in accordance with the Bribery Act 2010.

#### Employee Details

Name	
Department	
Date of request	

#### Client/Supplier/Business Contact Details

Company name and address	
Individual's name (if applicable)	
Relationship (e.g. client/supplier)	

#### Details of Gift / Hospitality

Reason for gift / hospitality	
Description of gift / hospitality	
Approximate cost of gift / hospitality (if known)	

#### Authorised? Yes / No

Name: \_\_\_\_\_

Date: \_\_\_\_\_

Job Title: \_\_\_\_\_

## Provision of Gift / Hospitality Authorisation Form – Appendix 2

This form is to be used in order to obtain authorisation for the purchase of any gift or hospitality up to the maximum value of £50 (inclusive of VAT) per recipient that you propose to provide to a client, supplier or any other third party. This form will be kept as evidence of due diligence in accordance with the Bribery Act 2010.

### Employee Details

Name	
Department	
Date of request	

### Client/Supplier/Business Contact Details

Company name and address	
Recipient's name	
Relationship (e.g. client/supplier)	

### Gift Details

Reason for gift	
Description of gift to be purchased	
Cost of gift	

### Authorised? Yes / No

Name: \_\_\_\_\_

Date: \_\_\_\_\_

Job Title: \_\_\_\_\_

**Provision of Gift / Hospitality Authorisation Form – Appendix 2**

**Hospitality Details**

Reason for hospitality	
Date of hospitality	
Type of hospitality (including venue)	
Total cost of hospitality	
Names of all attendees	

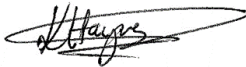
**Authorised? Yes / No**

Name: \_\_\_\_\_ Date: \_\_\_\_\_

Job Title: \_\_\_\_\_

**For Head of Business Operations use only:**

Date expense claim received		Name	
Expense claim matches amount requested	Yes / No	Signature	
If variance please detail		Date checked	
Expense form requires escalation	Yes / No		




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**Kerry Haynes**

**HR Manager**

**MiCiM Ltd**