

## ANTI-BRIBERY AND CORRUPTION POLICY

### Summary of Key Points

*This section picks out key highlights of the policy only. Please ensure you read the policy in full.*

- CMC will not tolerate any form of bribery or corruption.
- CMC requires all staff, sub-contractors, third party suppliers and business partners to maintain the highest standards of business conduct.
- Breaching this policy may result in disciplinary action for staff, up to and including dismissal, and termination of contract for sub-contractors and third party suppliers or business partners.
- This policy should be read in conjunction with CMC's Anti-Bribery and Corruption Policy Procedural Guidance document.

### Policy Objective

- CMC Partnership Consultancy Ltd ('CMC') is committed to achieving the highest standards of ethical conduct and integrity across all company business activities.
- CMC will not tolerate any form of bribery and is fully committed to working in an ethical manner that demonstrates its commitment to anti-corruption and prevention of bribery.
- This policy and associated procedures set company guidance to ensure that the highest standards of business conduct are maintained and that, if inappropriate and unacceptable behaviour does occur, it will be dealt with quickly, confidentially and effectively.

### Scope

- The company requires all staff, sub-contractors, third party suppliers and business partners to maintain the highest standards of business conduct, achieving full compliance with the anticorruption laws applicable to CMC's operations. This includes the US Foreign Corrupt Practices Act, the UK Bribery Act 2010, and any other anti-corruption laws applicable to nations in which CMC conducts business.
- This policy must be read in conjunction with CMC's Anti-Bribery and Corruption Policy Procedural Guidance document.

### Breach / Failure to Comply

- Any breach of this policy may cause serious damage to the reputation and standing of the company. The company may face criminal liability for the unlawful actions relating to bribery taken by its representatives.
- Failure to comply with this policy and a breach of anti-bribery law may lead to disciplinary action, including termination of employment or contract. Contractual relationships with other parties may also be terminated should they breach this policy.

- Any instruction to cover up wrongdoing is also a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, you should not agree to remain silent.
- CMC staff should refer to CMC's Whistle-Blowing Policy for further guidance.

### Policy Statement

- All staff, sub-contractors, third party suppliers and business partners acting for the benefit of CMC must never offer, provide or authorise the provision of a financial or other advantage to, or for the benefit of, any person or entity to corruptly or unlawfully influence the recipient in any way related to CMC's business.
- All staff, sub-contractors, third party suppliers and business partners acting for the benefit of CMC must never request, agree to receive or accept a financial or other advantage from any person or entity, intending that, in consequence, a business function will be performed improperly, or as a reward for the improper performance of a business function.

### Roles and Responsibilities

- Company directors are responsible for creating an organisational culture that prevents bribery and corruption from arising within company business activities, supporting managers to risk assess their business areas regularly against the risk of bribery and corruption.
- Company managers are required to provide documented training and on-going support to their employees, sub-contractors, third party suppliers and business partners working on behalf of the company, to ensure adherence is made to this policy and to the company's anti-bribery and corruption procedures.
- All individuals who work for, with, or on behalf of the company; employees, sub-contractors, third party suppliers and business partners have a responsibility to help detect, prevent and report instances of bribery and any other suspicious activity, wrongdoing or inappropriate behaviour.
- All parties working on behalf of CMC - employees, sub-contractors, third party suppliers and business partners - are expected to read, understand, and comply with this policy and any future policy updates that may be issued from time to time by the company.
- The Company Secretary is responsible for ensuring that individuals working on behalf of CMC - employees, sub-contractors, third party suppliers and business partners - are provided with this policy and the supporting guidance document and that this communication is documented through induction/ contractual agreement.

## Reporting, Risk Analysis and Governance

- Gifts or entertainment being given or received must be reported to CMC business managers or CMC account managers and registered with the Company Secretary, including the purpose and intention for which the gift/entertainment is being given or received, following guidance laid out in CMC's Anti-Bribery and Corruption Policy Procedural Guidance document.
- The Company Secretary is required to log these activities, providing quarterly updates to the Executive Board for monitoring and risk evaluation.
- The company will use internal audit and specialist financial auditors on a regular planned basis to monitor and review the implementation and effectiveness of this policy and its related procedures. This will include reviewing internal financial systems, expenses, corporate hospitality, gifts and entertainment policies.

## Communication and Awareness

- This policy will be communicated to all staff, sub-contractors and third party suppliers through the staff induction process and contractual correspondence.
- The policy will be available on the company noticeboards and to all staff, sub-contractors, third party suppliers, business partners and external interested third parties via the company website.
- Communication updates will be provided to all parties when policy updates are made.

## Policy Review

- This policy will be reviewed on a regular basis by the Board and may be amended at any time.

***Policy approved by the Senior Leadership Team & Board of Directors, CMC Partnership Consultancy Ltd, December 2018***