Sustainable TALENT

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Energising people. Fuelling growth.

Anti-Bribery and Corruption Policy

What does the policy cover?

This policy exists to set out the responsibilities of Sustainable Talent Ltd and those who work for the Company in relation to observing and upholding our zero-tolerance position on bribery and corruption.
It also exists to act as a source of information for those working for Sustainable Talent Ltd

Policy Statement

Sustainable Talent Ltd is committed to conducting business in an ethical and honest manner and is committed to implementing and enforcing systems that ensure bribery is prevented. Sustainable Talent Ltd has zero-tolerance towards bribery and corrupt activities. We are committed to acting professionally, fairly and with integrity in all our business activities.

Sustainable Talent Ltd will uphold all laws relating to anti-bribery and corruption. We are bound by the laws of the Bribery Act 2010 and take our legal responsibilities seriously.

Sustainable Talent Ltd recognises that bribery and corruption offences are punishable by a maximum of 10 years imprisonment and a fine. The result of committing such an offence will prohibit tendering for public tenders and damage beyond repair our reputation as an honest company with integrity.

Who is covered by the policy?

This anti-bribery policy applies to all employees (whether temporary or permanent), all consultants, Directors, agency workers or any other person associated with us including third parties. For the avoidance of doubt 'third parties' refers to any individual or organisation our company meets and works with. It refers to actual and potential clients, customers, suppliers, business contacts, agents, advisors, and government and public bodies – this includes their advisors, representatives and officials, politicians and public parties.
Any arrangement our company makes with a third party is subject to clear contractual terms, including specific provisions that require the third party to comply with minimum standards and procedures relating to anti-bribery and corruption.

Definition of bribery

Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting or soliciting something of value or of an advantage so to induce or influence an action or decision.

A bribe refers to any inducement, reward or object/item of value offered to another individual in order to gain commercial, contractual, regulatory or personal advantage.

Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law.

Bribery is illegal. Employees must not engage in any form of bribery, whether it is directly, passively or through a third party. They must not accept bribes in any degree and if they are uncertain about whether something is a bribe or a gift or act of hospitality, they must seek advice from their manager.

What is and what is not acceptable

This section of the policy refers to 4 areas:

- Gifts and hospitality
- Facilitation payments
- Political contributions
- Charitable contributions

Gifts and hospitality

Sustainable Talent Ltd accepts normal and appreciative gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts meets the following requirements:

1. It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits.
2. It is not made with the suggestion that a return favour is expected.
3. It is in compliance with the local law.
4. It is given in the name of the company, not in an individual's name.
5. It is appropriate for the circumstances. For example, small gifts around Christmas time.
6. It is of an appropriate type and value and given at an appropriate time, considering the reason for the gift.
7. It is given/received openly, not secretly.
8. It is not selectively given to a key, influential person clearly with the intention of directly influencing them.
9. It is not above a certain excessive value as predetermined by the company Directors.
10. It is not offered to or accepted from a government official or representative or politician or political party without prior approval of the company Directors.

Where it is inappropriate to decline the offer of a gift, for example, when meeting with an individual of a certain religion or culture who may take offence, the gift may be accepted so long as it is declared to the company Directors who will assess the circumstances.

Sustainable Talent Ltd recognises that the practice of giving and receiving business gifts varies between countries, regions, cultures and religions, so definitions of what is acceptable and not acceptable will vary for each.

As good practice, gifts given and received should always be disclosed to your manager or the Directors. Gifts from suppliers should always be disclosed.

The intention behind a gift being given/received should always be considered. If there is any uncertainty, the advice of your manager or a Director should be sought.

Facilitation Payments and Kickbacks

Sustainable Talent Ltd does not accept and will not accept any facilitation payments of any nature. We recognise that facilitation payments are a form of bribery that involves expediting or facilitating the performance of public official or business manager to speed up or securing the performance of a certain duty or action.

Sustainable Talent Ltd does not allow kickbacks to be made or accepted. We recognise that kickbacks are typically made for a business favour or advantage.

Political Contributions

Sustainable Talent Ltd will not make donations, whether in cash, kind or by any other means, to support any political parties or candidates. We recognise this may be perceived as an attempt to gain an improper business advantage.

Charitable Contributions

Sustainable Talent Ltd accepts the act of donating to charities, whether through services, knowledge, time, or direct financial contributions. Any donations made will be liable to full disclosure. Employees must be careful to ensure charitable contributions are not used to facilitate and conceal acts of bribery. We will ensure that all charitable donations are not offered/made without the approval of the Directors.

Employee Responsibilities

As an employee of Sustainable Talent Ltd you must read, understand and comply with the information contained within this policy and with any training or other anti-bribery and corruption information you are given.

All employees and those under our control are equally responsible for the prevention, detection and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this anti-bribery policy.

If you have reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, you must notify your manager or the Directors.

If any employee breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct. Sustainable Talent Ltd has the right to terminate a contractual relationship with an employee if they breach this ant-bribery policy.

How to Raise a Concern

If you suspect that there is an instance of bribery or corrupt activities occurring in relation to Sustainable Talent Ltd, you are encouraged to report your concerns as soon as possible. If you are concerned or uncertain, that any action or behaviour could be considered bribery you should speak to your manager or Directors.

What to do if you are a victim of bribery or corruption

You must tell your manager as soon as possible if you are offered a bribe by anyone, if you are asked to make one, if you suspect you may be bribed or asked to make a bribe in the near future, or if you have reason to believe that you are a victim of another corrupt activity.

Protection

If you refuse to accept or offer a bribe, or you report a concern relating to potential acts of bribery or corruption, Sustainable Talent Ltd understands you may feel worried about potential repercussions. Sustainable Talent Ltd will support anyone who acts in good faith under this policy, even if investigation finds that they were mistaken. Sustainable Talent Ltd will ensure that no one suffers any detrimental treatment as a result of refusing to accept or offer a bribe or other corrupt activities or because they reported a concern relating to an act/acts of bribery or corruption. If you have reason to believe you have been subjected to unjust treatment as a result of a concern or refusal to accept a bribe you should inform your manager immediately.

Record Keeping

Sustainable Talent Ltd will keep detailed financial and accurate financial records and will have appropriate internal controls in place to act as evidence for all payments made. We will declare and keep a written record

of the amount and reason for hospitality or gifts accepted/given, and understand that gifts and acts of hospitality are subject to managerial review.

Publication and Training

All employees will receive training on this policy during their compulsory training. This policy is available to all staff, suppliers and clients on the company website.