



UNCLASSIFIED

ANTI-BRIBERY AND CORRUPTION POLICY

POL004

Title:	POL004: Anti-bribery and Corruption Policy		
Created:	17 June 2021	Reviewed:	3 Feb 2022
Version:	1.0	Pages:	Page 1 of 5



Introduction

It is illegal to offer, promise, give, request, agree receive or accept bribes. Akimbo Core Ltd (“Akimbo”) has a zero-tolerance policy for bribery. This policy lays out the actions required in regards to the prevention of bribery and corruption.

Scope

This policy applies to all staff of Akimbo, including employees, contractors, temporary staff, volunteers, apprentices, and work experience (collectively “Staff”).

Failure to comply with this policy may result in disciplinary action, up to any including dismissal without notice for gross misconduct.

Review

This policy is to be reviewed every year.

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Policy

This policy does not prohibit normal and appropriate hospitality (given or received) to or from third parties. Hospitality, promotional activities, or other business expenditure which seeks to improve the image of Akimbo Core, or to establish friendly relations with our customers, suppliers, or business partners is a recognised and accepted part of doing business. All expenditure of this nature must be approved in advance, in writing, by a Director.

Offers or receipts of gifts or hospitality could be employed as a form of bribery, therefore any gifts received from a customer, supplier, business partner, or during the course of business, must be reported to a Director.

The giving or receiving of gifts is not prohibited if approval is given by a Director, it is given openly, and the following requirements are met:

- ▶ It is not made with the intention of influencing, obtaining, or retaining a business advantage, or for the provision or retention of business, or in exchange for favours or benefits.
- ▶ It complies with the law.
- ▶ It is given in the Company's name, not your name.
- ▶ It does not include cash or cash equivalent (such as gift cards or vouchers)
- ▶ It is appropriate in the given circumstances, such as the custom of giving small gifts at Christmas.
- ▶ Considering the time and reason for the gift, it is of appropriate type and value.
- ▶ It is not given to, or accepted from, government officials or representatives – including politicians or political parties.

You must declare and keep a written record of all hospitality or gifts accepted or offered. This must be available for managerial review.

Facilitation Payments

Facilitation payments or “kickbacks” or any kind are prohibited. These include any payment, however small, to secure or expedite a routine action.

If you are asked to make a payment on the Company's behalf you must request a receipt which include the reason for the payment. If you have any suspicions, concerns, or queries regarding a requested payment you must either raise these with a Director or through the companies Whistle-blowing Policy.

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Breaches

Any breach of this policy must be reported to a Director immediately.

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