

ENLITEN IT LTD ANTI-BRIBARY AND CORRUPTION CODE

BRIBARY AND CORRUPTION POLICY STATEMENT

The elimination of bribery and corruption is central to Enliten ITs core values and to this end our code of conduct covers the key values, principles and responsibilities we expect our employees, advisors, consultants, customers and suppliers to adhere to.

The main components of the code are as follows:

- We take a zero tolerance approach to any form of Bribery or Corruption
- We never make or accept any form of bribe
- We will comply with the relevant rules and regulations in force in each country in which we operate
- All staff are required to comply with our code of conduct and proactively manage the policy to ensure they do not inadvertently make or accept anything that may be considered to constitute a bribe
- We recognises that in the normal course of business donations, hospitality and gifts may either be given or received and clear guide lines on what is/is not acceptable have been put in place together with rules for reporting, monitoring and authorisation.

1 WHO IS COVERED BY THE POLICY?

This policy applies to all staff (whether permanent, fixed-term or temporary), consultants or contractors.

2 WHAT IS BRIBERY?

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. Examples of bribes:

Offering

You offer a potential client tickets to a major music/sporting event, but only if they agree to do business with us.

This would be an offence as you are making the offer to gain a commercial and contractual advantage. We may also be found to have committed an offence because the offer has been made to obtain business for us. It may also be an offence for the potential client to accept your offer.

Receiving

A supplier gives a job to a family member of yours, but makes it clear that in return they expect you to use your influence in our organisation to ensure we continue to do business with them.

It is an offence for a supplier to make such an offer. It would be an offence for you to accept the offer as you would be doing so to gain a personal advantage.

3 GIFTS AND HOSPITALITY

- a. This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties. However all offers, with the exception of mid-day lunch or an evening meal must be agreed in advance (in writing) with the MD.
- b. Where gifts are received they will be deemed to be a gift to the company and as such will be placed in a raffle or similar event, so that such gifts will either be available to any employee or may be donated to charity.

- c. The giving or receipt of gifts is not prohibited, if the following requirements are met:
 - i. it is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in exchange for favours or benefits;
 - ii. it complies with local law;
 - iii. it is given in our name, not in your name;
 - iv. it does not include cash or a cash equivalent (e.g. gift certificates/vouchers);
 - v. taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time; and
 - vi. it is given openly, not secretly.

4 **WHAT'S NOT ACCEPTABLE?**

It is not acceptable for you (or someone on your behalf) to:

- a. accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them;
- b. accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return;
- c. threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
- d. engage in any activity that might lead to a breach of this policy.

If in doubt regarding what constitutes an acceptable gift or hospitality consult the MD.

5 **DONATIONS**

We only make charitable donations that are legal and ethical under local law and practice. No donation must be offered or made without the prior approval of the MD.

6 **STAFF RESPONSIBILITIES**

You must ensure that you read, understand and comply with this policy.

- a. All staff are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- b. You must notify the MD as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.
- c. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with other workers if they breach this policy.
- d. You must ensure all expense claims relating to hospitality, gifts or expenses incurred to third parties are submitted.

7 **HOW TO RAISE A CONCERN**

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries, these should be raised with the MD.