

# ANTI-BRIBERY

2021

C&R

CAPITAL &  
REGIONAL

## **ANTI-BRIBERY**

The Bribery Act 2010 makes it criminal to offer or accept a bribe.

Punishments under the Act include for individuals 10 years' imprisonment and/or unlimited fines. For organisations there may be unlimited fines, trade restrictions and disqualification of partners/directors. A bribe is defined as something of value that is offered or accepted with the intention of obtaining or retaining business. A bribe would generally seek to improperly influence a business or individual so as to impair their independence and judgement.

For the purposes of the Act our activities generally fall under three categories:

### **TRANSACTIONAL**

We are involved in acting for clients in the context of supplying services and technology, including sales and professional advice. Only agreed fees must be accepted from the client with whom we have agreed terms of business.

### **BUSINESS**

We have contracts with suppliers who supply us with goods and services. By the same token we are suppliers under contract to other organisations. In both of these scenarios we must not offer or accept any gifts unless of nominal value. Even if unintended, gift giving may well be interpreted as a bribe.

### **HOSPITALITY**

You should only offer or accept gifts and hospitality that are customary and reasonable in terms of value and frequency. You should never offer or accept any gift or hospitality if it may improperly influence a business decision or impair independence or judgement or give the appearance of doing so. Bone fide hospitality and promotional activities which seek to improve the image of the business are not criminalised by the Act so long as such hospitality and promotion is intended to better present the services of the business and establish cordial relations.

The type of hospitality and promotion that we use should be recognised as an established and important part of doing business and commonly adopted within the industry.

We have zero tolerance to bribery in all our areas of activity. It should be remembered that acceptance or the offer of a bribe is a criminal offence under the Bribery Act 2010 and the Proceeds of Crime Act 2002 (money laundering).

There must not be any corrupt practices and any member of staff found to be involved in bribery or money laundering will be immediately dismissed on the grounds of gross misconduct.