

NEWMAN SCOTT LIMITED

Bribery Policy

From 1st July 2011 the Law has made it a criminal offence for any person or organisation to offer or receive bribes. The penalty for doing so is an unlimited fine AND/OR up to 7 years in prison.

1. Purpose

The purpose of this policy is to set rules for all employees of Newman Scott Ltd and make sure all Employees comply with the new law and act in a moral and responsible way.

2. What is Bribery

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual or personal advantage. It can be in the form of simple money or other valuable benefits.

If a bribe is paid, both the person receiving it and the person making It are committing a criminal offence.

3. Examples of Bribes

- a. Giving someone who works for a client a free holiday in the hope that they give or continue to give us work from that client
- b. Giving lavish hospitality to someone who works for a client in the hope that they give or continue to give us work from that client
- c. Arranging work for free at the home of someone who works for a client in the hope that they give or continue to give us work.
- d. Giving that person money or other goods on the same basis
- e. Receiving any free goods or money or services from our suppliers or sub-contractors for your own personal benefit.

4. Examples of things that are not a Bribe

- a. Giving or receiving a bottle of malt whisky at Christmas.
- b. Paying for someone to go on a corporate golf day, or other corporate event with other clients representatives provided that the expenditure is not lavish and the arrangement is not concealed

The Act is not intended to stop normal and everyday social contact between business contacts that are intended to cement relationships provided the scale is appropriate.

Hospitality is acceptable providing it is appropriate and in line with normal company hospitality at Newman Scott. This policy should not inhibit you from performing your work provided the activities undertaken are customary, appropriate and properly recorded.

A simple test if you are unsure what is a bribe is to ask yourself the question “Would I want the owner of my business and the owner of the recipients business to know about this?”. If the answer is “No” or “Not sure” then it is probably a bribe. In that event seek advice from the Financial Director before going further.

The acceptance of significant gifts from clients, their close family or friends is normally not allowed, however, in some countries or cultures the exchange of gifts is the norm. If this situation arises you must consult with the directors of Newman Scott Limited before exchanging or receiving gifts.

5. Policy

Newman Scott Limited prohibits any transaction which leads to a personal gain or advantage to the recipient, person or body that is intended to influence the recipient to take an action that may be or may not be in the full interests of Newman Scott

6. Rules

- a. You must not, directly or indirectly, offer any type of bribe be it cash or any other benefit to anyone.
- b. You must not, directly or indirectly receive or ask for any type of bribe be it cash or any other benefit from anyone.
- c. You must report to and obtain the prior authority of a Director of Newman Scott before receiving any free goods or money or services from our suppliers or sub-contractors for your own personal benefit
- d. You must not, directly or indirectly gain any commercial, personal, contractual or regulatory advantage for Newman Scott in a way which is unethical or illegal.
- e. Gifts or a donation to any form of political party is strictly forbidden.
- f. If gifts are exchanged or hospitality undertaken there must be a record made of the matter which must be shown to the Financial Director including receipts, invoices and expenses.

7. Penalties

Any breach of the above rules will be treated as gross misconduct and if proved will normally result in instant dismissal.

8. Whistle Blowing

If you suspect that a work colleague is involved in bribery you must report it to the Financial Director.

Your concerns will be treated in the strictest confidence and your name will not be disclosed to the person who you are suspicious about. Unless it is established that your behavior was malicious you will receive no detrimental treatment even if your concern proves groundless.

9. Responsibility

It is the responsibility of everyone who works for Newman Scott Ltd to adhere to this policy. Receipts for all gifts and hospitality must be handed to the Finance Director.

The Finance Director has overall responsibility for both the enforcement and monitoring of this policy

If you are in any doubt that a potential act does not conform to this policy you should not carry out the transaction and consult the Finance Director.

10. Implementation

This Policy starts with immediate effect.

It will be evaluated and reviewed as necessary.

All employees will be notified of this policy and trained as required.

John Graham

Director

21st July 2011