

ANTI-CORRUPTION POLICY



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TABLE OF CONTENTS

TABLE OF CONTENTS	2
LIST OF FIGURES.....	3
LIST OF TABLES.....	4
ASSOCIATED DOCUMENTS.....	5
DOCUMENT REVISION NOTES	5
SECTION A. INTRODUCTION	6
SECTION B. POLICY AIM	6
SECTION C. THE LAW.....	6
SECTION C.1. POLICY STATEMENT.....	6
SECTION C.2. EMPLOYEE RESPONSIBILITY.....	6
SECTION C.3. GIFTS AND HOSPITALITY	7
C.3.1. <i>Receiving Business Gifts</i>	7
C.3.2. <i>Offering Business Gifts</i>	7
C.3.3. <i>Receiving Hospitality</i>	7
C.3.4. <i>Offering Gifts and Hospitality</i>	7
C.3.5. <i>Donations to Organisations</i>	7
SECTION D. NON-COMPLIANCE.....	7
SECTION D.1. STAFF	7
SECTION D.2. VISITORS	7
SECTION E. MONITORING POLICY.....	7
SECTION F. DEFINITIONS.....	8
SECTION G. REVIEWING POLICY	8
SECTION H. POLICY AMENDMENTS	8
SECTION I. POLICY IMPLEMENTATION NOTICE.....	9

LIST OF FIGURES

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LIST OF TABLES

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ASSOCIATED DOCUMENTS

Pisys Ref. Number	Title / Description

DOCUMENT REVISION NOTES

REV	Title / Description

SECTION A. INTRODUCTION

Pisys is committed to implementing and enforcing effective systems to counter bribery. Therefore, it is Pisys policy to always conduct all aspects of its business honestly and ethically.

This policy applies to all individuals working for Pisys, including anyone providing services to Pisys such as consultants, or contractors.

SECTION B. POLICY AIM

This policy aims to help Pisys act in accordance with the Bribery Act 2010, maintain the highest possible standards of business practice, and advise individuals of Pisys' 'zero-tolerance' to bribery.

SECTION C. THE LAW

Under UK law (UK Bribery Act 2010), bribery and corruption are punishable for individuals by up to ten years imprisonment. If Pisys is found to have taken part in corruption or lacks adequate procedures to prevent Bribery, it could face an unlimited fine and be excluded from tendering for Government contracts

Section C.1. POLICY STATEMENT

This policy applies to all permanent and fixed-term staff employed by Pisys, and any contractors, consultants or other persons acting under or on behalf of Pisys.

Pisys will not:

- Make contributions of any kind with the purpose of gaining any commercial advantage.
- Provide gifts or hospitality with the intention of persuading anyone to act improperly, or to influence a public official in the performance of their duties.
- Make, or accept, "kickbacks" of any kind.

Pisys will:

- Keep appropriate internal records that will evidence the business reason for making any payments to third parties.
- Encourage employees to raise concerns about any issue or suspicion of malpractice at the earliest possible stage.
- See that anyone raising a concern about bribery will not suffer any detriment as a result, even if they turn out to be mistaken.

Section C.2. EMPLOYEE RESPONSIBILITY

Employees must not:

- Accept any financial or other reward from any person in return for providing some favour.
- Request a financial or other reward from any person in return for providing some favour.

- Offer any financial or other reward from any person in return for providing some favour.

Section C.3. GIFTS AND HOSPITALITY

This policy does not prohibit giving and receiving promotional gifts of low value, or normal and appropriate hospitality.

C.3.1. Receiving Business Gifts

Receiving promotional gifts of low value is normal and appropriate, however, gifts with a value exceeding £25.00 may not be accepted without approval. Any gift offered and then refused because of its value, must be reported to Pisys.

C.3.2. Offering Business Gifts

Business gifts are primarily aimed at thanking customers and suppliers for their custom and loyalty, only authorised gifts may be given.

C.3.3. Receiving Hospitality:

The acceptance of corporate hospitality must be transparent; all invitations must be reported to Pisys before an employee accepts any invitation. The following areas are exempt while attending conferences, and seminars, sponsored by third parties.

- business and travel expenses incurred
- normal business lunches and meals

C.3.4. Offering Gifts and Hospitality

Pisys hospitality is primarily aimed at thanking customers and suppliers for their custom and loyalty. All hospitality events must have approval.

C.3.5. Donations to Organisations

No donations should be made to charities, political parties or other organisations without approval.

SECTION D. NON-COMPLIANCE

Section D.1. STAFF

Failing to observe Pisys policy may lead to disciplinary action in accordance with the Pisys Disciplinary Policy.

Section D.2. VISITORS

In the event of a breach of the policy by other organisations, or individuals, Pisys will take appropriate action.

SECTION E. MONITORING POLICY

The policy will be monitored on an ongoing basis to ensure that it addresses issues effectively.

The following will be monitored:

- That all individuals working for Pisys are advised of the policy.

- Assessment of any reported incident or related occurrence.

Monitoring of the policy is essential to assess how effective Pisys has been to establish control of its obligations.

SECTION F. DEFINITIONS

A bribe is a financial or other advantage offered or given to anyone to persuade them to or reward them for performing their duties improperly, or, with the intention of influencing them in the performance of their duties.

Hospitality is the practice of being hospitable, this includes the reception and entertainment of guests/visitors.

Kickbacks or facilitation payments are typically small payments made in return for a business favour or advantage.

SECTION G. REVIEWING POLICY

This policy will be reviewed and, if necessary, revised in the light of legislative or organisational changes. Improvements will be made by learning from experience and the use of an established annual review.

SECTION H. POLICY AMENDMENTS

Should any amendments, revisions, or updates be made to this policy it is the responsibility of Pisys senior management to see that all relevant employees receive notice. Written notice and/or training should be considered.

SECTION I. POLICY IMPLEMENTATION NOTICE

This is the policy statement of:

Pisys Limited

The overall and final responsibility for this policy is that of:

The Directors

Signed:



Date:

01st November 2012

Day-to-day responsibility for ensuring this policy is put into practice is delegated to:

The Directors, the Office Manager & the HR Manager

Policy review date:

01st November 2025