

# Anti-Bribery and Corruption Policy Statement July 2018

This is the statement of general policy and arrangements for:



Overall and final responsibility for anti-bribery and corruption:

Adinet UK is committed to the principles and best practice of anti-bribery and corruption policies.

Adinet believes that the materialisation of Bribery and Corruption can stem from any number of root causes, but that poor transparency, poor controls, and poor standards, encourage their proliferation. This Policy statement defines clear principles which outline Adinet's position on Bribery and Corruption.

At all times Adinet:

- Conducts its business fairly, honestly, transparently, and with integrity
- Does not make or offer bribes, whether directly or indirectly, to gain business advantage
- Does not request or accept bribes, whether directly or indirectly, to gain business or other advantage
- Develops an evolving programme and procedures to implement and support these standards.

Staff must:

- Refuse any bribe or inducement in a manner which is not open to misunderstanding or which may give rise to false expectations
- Report any offers of bribes or inducements
- Report any suspicious behaviour
- Report any breaches of this Policy, related principles, or associated legislation.

NB Any proven instance of staff accepting or offering a bribe is considered an act of gross misconduct and the relevant authorities are informed.

**Facilitation Payments:** Facilitation Payments (otherwise known as 'grease payments') are not seen by many as being equivalent to large scale corruption and as such are not illegal in certain countries. However, the UK Bribery Act (2010) considers facilitation payments to be illegal. As a result, Adinet has a zero tolerance for this activity. All requests for facilitation payments must be reported.

**Political Contributions:** Adinet does not make any donations to political parties, nor does it incur political expenditure.

**Reporting Suspicions:** All suspicions or evidence of another member of staff, or anyone acting for or on behalf of Adinet, who may have engaged in corrupt behaviour, must be reported at the earliest possible opportunity. All reports raised are taken seriously and no member of staff is discriminated against in any way as a result of reporting a concern in good faith. Adinet supports any member of staff who makes such a report and ensures that the report is treated appropriately. No disciplinary action is taken against any person who makes a legitimate report, even if the suspicions turn out to be incorrect.

Disciplinary action is taken against any person who attempts to victimise or discriminate against a person making such a report. Reporting can be via line management in confidence.

Signed:

Dated: July 2018