

Anti-bribery Policy

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Owner: Susan Campbell, Head of HR & D Reference: POL 005

Why do we need this policy?

The Bribery Act 2010 has been introduced under which bribing, being bribed, bribing a foreign public official and failing to prevent bribery are all offences. This policy is designed to protect our business and Board by mitigating the risk of bribery.

What this policy covers

The business conduct of all Business Stream employees, contractors and agency workers.

1.0 Introduction

Our aim is to encourage a working environment and culture in which bribery in any form is not tolerated and where individuals can play an active role in preventing bribery. It is necessary to acknowledge that it may not be possible to prevent bribery completely but we will ensure there are adequate controls in place, reviewed on an annual basis.

2.0 Other related policies

This policy should be read in conjunction with:

- Corporate governance policy & Code of business conduct & ethics
- Disciplinary policy
- Gifts and hospitality policy
- Account adjustment, refund & transfer policy
- Fraud policy
- Unacceptable actions policy
- Whistleblowing policy

3.0 Universal policy

It is essential that all contractors and agency workers are aware of the content of this policy as they will be expected to comply with the standards of behaviour at all times. Business Stream employees who interact with our suppliers are expected to communicate our anti-bribery policy.

4.0 What is an act of bribing?

“Bribing can be defined as the intention to induce or reward improper performance of relevant function or activity.” Brodies LLP

In other words, offering money or a gift to someone with the purpose of influencing their conduct.

5.0 Appropriate conduct

At both a business and an individual level, we must:

- exercise due diligence when engaging with or entering into business with another party
- risk assess our vulnerability to bribery in general business activity on an ongoing basis
- communicate our anti-bribery stance through the business and our supply chain
- use a common sense and proportionate approach to help protect our business

Under no circumstances can a Business Stream employee, contractor, agency worker or anyone representing Business Stream offer or accept a bribe. If you feel uncomfortable with any form of gift that you have been offered or the reasons why you've been offered it, then do not accept it and report the offer to the head of HR & D.

5.1 Misconduct and appropriate action

If a member of staff, contractor or agency worker believes there to be misconduct as regards bribery, they are asked to refer to the Whistleblowing policy. Business Stream will then take the appropriate action. Action will also be taken against anyone found to be in breach of this policy.

6.0 Staff protection

While this policy sets out appropriate conduct of Business Stream employees, it is also designed to protect our staff. Staff in certain areas of the business are more exposed to the risk of bribery. Our call recording may be used as evidence in this situation, or if legal action is appropriate, as per Call recording policy.

All employees must report any suspicious activity or any concerns about business conduct in relation to bribery to the head of HR&D immediately.

7.0 Review

This policy will be reviewed on or before 30 April 2012.