Anti-Bribery & Corruption Policy

Huws Gray is committed to carrying out business fairly, honestly and openly and has a zero-tolerance policy towards bribery and corruption in any form whether direct or indirect. Huws Gray is committed to the implementation and enforcement of effective systems to counter corruption and bribery and will avoid doing business with others who do not commit to doing business with integrity and without bribery or corruption. Huws Gray recognises that preventing bribery and corruption is an ethical issue to which it is fully committed.

The Bribery Act 2010 not only makes bribery illegal but also holds UK companies, and foreign companies which do business in the UK, liable for failing to prevent bribery offences by those working for it or on its behalf, no matter where the offending acts take place. There are four main offences under the Act:

- **Paying a bribe:** offering, promising or giving a financial or other advantage to a person, to perform a business or public activity improperly, in breach of their duty.
- **Receiving a bribe:** requesting, agreeing to receive or accepting a financial or other advantage, in return for improper performance of a business or public activity, in breach of their duty.
- **Bribery of foreign public officials:** bribing a foreign public official, with the intention of influencing that public official in his or her official role and of securing business or a business advantage
- **Failure of commercial organisations to prevent bribery:** an offence will be committed where a person associated with a relevant commercial organisation bribes another person (whether in the UK or overseas) with the intention of securing a business advantage for that organisation, unless it can show that it had in place adequate procedures which were designed to prevent bribery.

A bribe is any gift, loan, fee, reward or other advantage (financial or otherwise) given to or received from any person in order to obtain, retain or direct business or to secure any other improper advantage in the conduct of business and includes a kickback on any portion of a contract payment. It is prohibited for Huws Gray staff to offer, give, authorise or accept a bribe in any form. It is also prohibited to use any other route or channel to provide a bribe to or receive a bribe from customers, agents, contractors, suppliers, employees of any such party or government officials.

Facilitation payments are payments made to government officials or employees to facilitate or speed up routine bureaucratic transactions and they are common in some jurisdictions. Such payments are regarded as bribes and are therefore illegal. Huws Gray's staff should never make a facilitation payment either directly or indirectly or through a third party.

Staff must avoid giving or receiving hospitality, entertainment and gifts if these could be intended, or be reasonably interpreted, as an improper reward or encouragement for a favour or preferential treatment in connection with Huws Gray's business. Hospitality, entertainment and gifts can include but are not limited to the offer or receipt of gifts, meals, goods, services, favours, loans, trips, accommodation, and the use of property or invitations to events, functions or other social gatherings. All employee entertainment expenditure must be authorised by Area Manager or relevant Director before it is incurred.

Sometimes in business, and particularly in certain cultures, an exchange of gifts is appropriate. In such instances, the gifts should be reasonable, in good taste and have a token or nominal value. Any form of hospitality, entertainment or gifts valued above £250 must be declared and authorised, before accepting, by a Director and recorded on the portal.

Huws Gray's staff are required to raise concerns about bribery or corruption or any breach of the Policy or its underlying policies and procedures referred here in, as early as possible, to a senior member of management or directly to one of the directors. Individuals are able to do this in confidence and without the risk of reprisal. Huws Gray aims to encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken.

Any breach of this Policy and/or its underlying policies and procedures will be regarded as a serious matter by Huws Gray and is likely to be dealt with under the disciplinary procedure. Serious cases may be treated as gross misconduct leading to summary dismissal.