



# Bribery Policy

Under the Bribery Act 2010, a bribe is a 'financial or other advantage' offered, promised or given to induce a person to perform a relevant function or activity improperly, or to reward them for doing so. The Act makes it a criminal offence to:

- offer, promise, or give a bribe.
- request, agree to receive or accept a bribe.
- bribe a foreign public official to obtain or retain business or a business advantage.
- (by an organisation) fail to prevent bribery by those acting on its behalf ('associated persons') to obtain or retain business or a business advantage for the organisation.
- Small payments made to government officials or others to make something happen, or happen sooner, (commonly called facilitation payments) are likely to be bribes and unlawful under the Act.

All forms of bribery and corruption are prohibited. Acorn will not tolerate any act of bribery or corruption; any breach of this policy will result in disciplinary action being taken and may result in dismissal.

Individuals should note that bribery is a criminal offence in the UK that may result in up to 10 years' imprisonment and/or an unlimited fine for the individual and an unlimited fine for the organisation on behalf of which the bribery offence is committed.

Receiving or offering a gift or hospitality is often an important part of developing and maintaining relationships, however they must be accepted or offered for a genuine reason, which would be considered acceptable in the ordinary course of business.

Depending on the circumstances, the appropriate action may be to:

- accept and keep the gift or hospitality; (limit £50.00)
- accept the gift but raffle it among colleagues and donate the money to charity
- accept the gift but share it with colleagues
- politely decline the gift or hospitality; (anything that is considered to be lavish)

Any expenditure which does not comply with this principle must be authorised in advance in writing by email by the appropriate line manager. It is a personal responsibility of both the individual requesting authorisation by email and the line manager giving his response to that request to retain a copy of all such email correspondence as all individuals may be called by the company to produce evidence of any such requests and the responses given at any time.

Any Employee accepting/offering unauthorised gifts will subject to disciplinary action.

A handwritten signature in blue ink, appearing to read 'C Till'.

Mr C Till – Managing Director  
20.03.2023