

Anti-bribery and Corruption Policy

POL 004

LEEPS Ltd (“LEEPS”) is committed to implementing and enforcing effective systems to counter bribery. Therefore, it is the Company’s policy to conduct all aspects of its business in an honest and ethical manner at all times and to maintain the highest possible standards of business practice and advise individuals of the Company’s 'zero-tolerance' to bribery. This policy document applies to all individuals working for LEEPS, including anyone providing services to the Company such as consultants, or contractors.

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

LEEPS will uphold all laws relevant to countering bribery and corruption and is bound by the laws of the UK, including the Bribery Act 2010, in respect of its conduct, both at home and abroad. In accordance with this legislation, all those working for or on behalf of the company should follow the guidance outlined below:

- ❖ inform the Managing Director of any hospitality valued at more than £50 or individual gift valued at more than £25
- ❖ employees and employees’ families should refuse to accept gifts or hospitality which could influence or appear to influence decisions they make on behalf of the Company
- ❖ acceptance and/or offer of small gifts such as flowers, and/or casual hospitality such as business lunches, is acceptable within reasonable bounds, as long as it is a normal and appropriate expression of business courtesy
- ❖ employees must ensure that offering or accepting a gift or hospitality does not create or appear to create a conflict of interest for those involved
- ❖ employees should make the Managing Director aware of all offers or acceptance of gifts or hospitality. If there is any doubt about the propriety of accepting a gift or hospitality, it should be refused

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- ❖ the primary responsibility for deciding whether gifts or hospitality should be accepted lies with you
- ❖ the offer or acceptance of all gifts or hospitality must be fully documented and approved by the Managing Director.

LEEPS recognises that bribery and corruption is punishable for individuals by up to ten years' imprisonment and if the Company is found to have taken part in corruption it could face an unlimited fine, be excluded from tendering for public contracts and face damage to its reputation. LEEPS therefore takes its legal responsibilities very seriously and will endeavour to prevent, detect and encourage staff to report any activity that they believe may contravene this policy. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct.

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.

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