



## **Swift Crafted Ltd Bribery and Corruption Policy**

### **Statement and Purpose of Policy**

- As involvement of bribery and corruption exposes Swift Crafted Ltd (the Business) and its employees to a criminal offence, damages business reputation, confidence of clients or customers, suppliers and business partners, the Business is committed to conducting its business in an honest and ethical manner.
- Bribery and corruption are criminal offences and as a UK-registered company the Business is subject to the Bribery Act 2010.
- The Business has a zero-tolerance towards bribery and corruption anywhere in its business and is committed to:
  - a. Acting in a professional and fair manner
  - b. Acting with integrity in all its business dealings

### **What does this Policy Cover?**

- This Policy covers bribery and corruption taking place anywhere in the business.
- This Policy sets out the steps everyone in the business must take to prevent bribery and corruption within the business in accordance with relevant legislation and business requirements.
- This Policy does not form part of any employment contract and the Business retains the right to amend it at any time.

### **What Are Bribery and Corruption?**

- A “bribe” is any inducement or reward that is offered, promised, requested or provided in order to gain a commercial, contractual, regulatory or personal advantage. In most cases a bribe will be financial or other advantage given to a person in order for them to perform a relevant function or activity improperly, or to reward them for doing so.
  - a. Bribes in the form of financial or other advantages may include:
    - i. Gifts
    - ii. Hospitality and entertainment
    - iii. Loans
    - iv. Services
    - v. Preferential treatment
    - vi. Discounts
    - vii. Promises to provide financial or other advantages in the future

- b. For something to be considered a bribe and be subject to this policy:
    - i. The timing of the bribe is relevant and any payment made or advantages given after a relevant event are considered bribes
    - ii. The payment made or advantage given can be given unknowingly
    - iii. It is also not necessary for the bribed party to actually receive a benefit as a result of a bribe
- Bribery includes:
  - a. Giving, offering or promising a bribe
  - b. Requesting, receiving or agreeing to receive a bribe
- “Corruption” is the misuse of power or office for private gain
- This means that one should:
  - a. Offer or provide a bribe to reward the business advantage received or in the expectation that a business advantage will be received.
  - b. Accept a third party’s offer that they know or suspect to be made with the expectation that it will provide a business advantage (to the third party or anyone else)
- No one must intimidate, threaten or retaliate against another person who has refused to accept or offer a bribe or who has raised concerns under this policy
- For the purposes of this Policy, it does not matter whether:
  - a. Bribery and corruption occur in the UK or abroad. Any act of bribery or corruption committed outside the UK may be prosecuted in the UK; or
  - b. The act of bribery and corruption is committed directly or indirectly

#### **Who Can Be Involved in Bribery and Corruption?**

- Bribery and corruption can be committed by:
  - a. Any worker of the Business regardless of seniority including all employees, directors and officers, consultants and contractors, agency workers, trainees and apprentices (Staff)
  - b. Anyone authorised to act on behalf of the Staff
  - c. The Business’s representatives or any other third parties who act on the Business’s behalf
  - d. The Business’s suppliers or clients

#### **Who is Responsible for this Policy?**

- The Board of Directors has overall responsibility for this Policy and ensuring that appropriate training is given to all relevant staff

#### **Gifts and Hospitality**

- All staff are forbidden from soliciting any gifts or hospitality in the course of their work for the Business
- All staff are forbidden from offering or receiving gifts or hospitality which are unduly lavish, extravagant or otherwise inappropriate from any person or organisation which has had or may have influence over the Business’s business.

- This policy does not prohibit the following practices providing they are customary in a particular market, or are proportionate and are properly recorded:
  - a. Normal and appropriate hospitality (given or received)
  - b. The giving of a ceremonial gift on a festival or at another special time

### **Keeping Records**

- A register of accepting or giving of gifts or hospitality will be kept and monitored on a regular basis via an internal audit schedule.
- Staff must declare in writing the details of and reason for all gifts or hospitality received or given to either the Office or Accounts Manager in a timely fashion

### **Reporting Issues Related to Bribery and Corruption**

- All Staff have a responsibility to comply with this Policy and prevent bribery and corruption and must notify their Line Manager as soon as possible if they:
  - a. Witness or otherwise discover anything corrupt or improper taking place
  - b. Are offered a bribe
  - c. Are asked to offer a bribe
  - d. Suspect or discover that any bribery or corruption has or may have taken place

### **Consequences of Non-Compliance**

- The Business takes compliance of this Policy very seriously and failure to comply puts both Staff and the Business at significant risk
- Staff who fail to comply with this Policy may commit a criminal offence
- Due to the importance of this Policy, failure to comply may result in disciplinary action and or dismissal for gross misconduct.



**Simon Hearle**  
**Managing Director**

10<sup>th</sup> April 2024