

Envision Communications Group Limited – Anti-Bribery Policy

This statement was last updated on 04/10/22

Purpose

The purpose of this Policy is to establish controls to ensure the compliance with all applicable anti-bribery and corruption regulations, whilst also ensuring Envision Communications Group Limited conducts business in a socially responsible manner.

Statement

It is the policy of Envision Communications Group Limited to conduct all of our business in an honest, ethical and transparent manner. We have a zero-tolerance approach to bribery and corruption. We are committed to working in a fair, open and honest way, and implement effective systems to counter bribery. We will uphold the law relevant to countering bribery and also corruption. We are bound by the laws of the UK, including said Bribery Act 2010, in regards to our conduct both home and abroad.

Who is covered by this policy

This anti-bribery policy applies to all employees (whether temporary or permanent), consultants, contractors, trainees, home workers, casual workers, agents sponsors, or any other persons associated with Envision Communications Group Limited (Including Third Parties) or any of our subsidiaries or their employees no matter where they're located (either within the UK, or outside of the UK). The policy also applies to Officers, Trustees, the Board, and/or committee members at any level).

For the context of this policy, third party refers to anyone or any business Envision Communications Group Limited meets or works with. It refers to actual and potential clients, customers, suppliers, distributors, business contacts, agents advisers and government and public bodies – this includes their advisors, representatives and officials, politicians and public parties.

Any Arrangement Envision Communications Group Limited makes with a third party is subject to clear contractual terms, and an expectation of that third party to comply with minimum standards and procedures relating to anti-bribery and corruption.

Definition of Bribery

Anti-Bribery act of 2010, came into force on 1st July 2011 and it covers the law relating to bribery. The legal definition of bribery is the offering or accepting of any gift, loan, payment, reward, or a business advantage for personal gain as an encouragement to do something which is dishonest, illegal or a breach of trust.

A bribe refers to any inducement, reward or object/item of value offered to another individual in order to gain commercial, contractual, regulatory or personal advantage. Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law.

Bribery is illegal. Employees of Envision Communications Group Limited, must not engage in any form of bribery, whether it be directly, passively as touched on above, or through a third party (such as an agent or distributor). For the avoidance of doubt, our employees must not accept bribes in any degree and should they be uncertain as to whether something is a bribe, a gift, or an act of hospitality then they must seek further advice from a Director.

What is and what is NOT acceptable

Gifts and Hospitality – Envision Communications Group Limited accepts normal and appropriate gestures of hospitality and goodwill (whether given to, or received from third parties) so long as the giving or receiving of gifts meets the following requirements:

- It is not made with the intention to influence who received, or reward the gain of business / retention of business or as an exchange for favours and/or benefits.
- It is not made with the suggestion that return favours are expected.
- It is compliant with UK law
- It is given in the name of the company, and not the individual
- It does not contain cash
- It is appropriate for the circumstances (gifts at Christmas)
- It is given and received openly
- It is not given to a select influential individual with clear intentions of influencing them.
- It is not offered to/received from a government official, politician, or political party without the prior approval of a Director of Envision Communications Group Limited.
- Where it is inappropriate to decline the offer (likely to cause offence i.e offensive within in a religion/culture)

- As good practice gifts given/received should always be disclosed to a Director. Gifts from suppliers for example should always be disclosed.

Facilitation Payments – Both facilitation payments and kickbacks shall not be received. We recognise that both of these methods are typically carried out with the intent on influencing business decisions.

Political Donations – . Envision Communications Group Limited Will not made political payments or donations, whether that be in cash, kind, or by any other means to support any political parties or candidate. We recognise that this may be seen as an attempt to gain improper business advantage.

Charitable Donations – Envision Communications Group Limited accepts and indeed encourages the act of donating to charities – whether through services, knowledge, time or direct financial contributions (cash or otherwise) and agrees to disclose all charitable contributions we make.

Employees are reminded to be careful to ensure that charitable donations are not used to facilitate and conceal acts of bribery. Envision Communications Group Limited will ensure that all donations are made legal, ethical and under UK Law and that donations are not offered without the approval of a Director.

Employee Responsibilities

As an employee of Envision Communications Group Limited, you must ensure that you read, understand and comply with the information contained within this policy, and with training or other anti-bribery and corruption information you are given.

All employees and those under our control are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply a breach of this anti-bribery policy.

If you have reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that has breached this policy, you must notify your line manager or a Director.

If any employee breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct. Envision Communications Group Limited Has the right to terminate a contractual relationship with an employee if they breach this anti-bribery policy.

Raising Concerns

How to raise a concern – If you suspect that there is an instance of bribery/corruption occurring in relation to Envision Communications Group Limited, you are encouraged to raise your concerns at as early a stage as possible. If you're uncertain about whether a certain action or behaviour can be considered bribery or corruption, then you should speak to your line manager or a Director of the business.

Envision Communications Group Limited will familiarise all employees with the methods to raise a concern in confidence.

If you believe you are a victim of bribery /corruption, then you must make your line manager or Director aware as soon as possible. If you are asked to make one, if you suspect that you may be bribed, or asked to make a bribe in the near future.

If you refuse to accept or offer a bribe or you report a concern relating to potential act(s) of bribery or corruption, Envision Communications Group Limited understands that you may feel worried about potential repercussions. Envision Communications Group Limited will support anyone who raises concerns in good faith under this policy, even if investigation finds that they were mistaken.

Finally, Envision Communications Group Limited will ensure that no one will suffer detrimental treatment as a result of refusing to accept or offer a bribe or other corrupt activities, or because they reported a concern relating to potential act(s) of bribery and corruption in good faith.

To be clear, Envision Communications Group Limited will not carry any disciplinary action, allow threats, or unfavourable treatment by raising concerns when in good faith.

Training and Communication

Envision Communications Group Limited will provide training on this policy as part of its induction process for all new employees. Employees will also receive regular and relevant training on how to adhere to this policy and will be asked annually to formally accept that they will comply with this policy.

Envision Communications Group Limited's anti-bribery and corruption policy and zero tolerance attitude will be clearly communicated to all suppliers, contractors, business partners, consultants, and any third parties at the outset of business, and as appropriate thereafter.

Envision Communications Group Limited will provide relevant anti-bribery and corruption training to all employees, consultants, agents, etc where we feel their knowledge of how to comply with the Bribery Act needs to be enhanced.

Record Keeping

Envision Communications Group Limited will keep detailed and accurate financial records, and will have appropriate internal controls in place to act as evidence for all payments made. We will declare and keep a written record of the amount and reason for hospitality or gifts accepted and given, and understand that gifts and acts of hospitality are subject to managerial review.

Monitoring & reviewing

Envision Communications Group Limited's Directors are responsible for monitoring the effectiveness of this policy and will review the implementation of it on a regular basis. They will assess its suitability, adequacy, and effectiveness. Our internal control systems and processes designed to prevent bribery and corruption are subject to regular inhouse audits to ensure that they are effective in practice.

Any need for improvements will be implemented as soon as possible. Employees are encouraged to offer feedback on this policy should they have suggestions for how it may be improved. Feedback of this nature should be addressed to the Managing Director. This policy does not form part of their contract of employment and may amend it at any time so to improve its effectiveness at combatting bribery and corruption.