



IDENTITY

# Prevention of Bribery and Corruption Policy

Identity Events Management – Sole  
Proprietorship LLC  
Version: **2.1** Dated: **01/03/2023**



## 1. Summary of Policy for Prevention of Bribery and Corruption

### 1.1 Identity requires its employees:

- to always act in the best interests of the company;
- to act with care and impartiality in all dealings with other parties; and
- to follow the principles of Integrity, Objectivity, Accountability, Openness and Honesty in all business dealings on behalf of the Company

### 1.2 As such, Identity:

- is committed to carrying out its business activities in an honest, open and ethical manner;
- is committed to observing these commitments, in respect of its conduct internationally. adopts zero tolerance to any aspect of bribery and corruption both within the company and in respect of any third parties with whom we have dealings.

**1.3** The Policy applies to all individuals working at all levels and grades on behalf of the Company, including directly employed (whether on permanent, fixed term or temporary employment contracts), consultants, contractors, trainees, seconded staff, staff working from home, casual staff, agency staff, interns, sponsors or any other person associated with the company wherever located (collectively referred to as "**Staff**" within this policy).

## 2. Aim of the Policy

**2.1** The aim of this Policy is to detail how the Company implements and enforces effective systems to prevent bribery and corruption. As such this policy: -

- Sets out the Company's responsibilities, together with those of its Staff in observing and upholding the Company's position on bribery and corruption.
- Provides information and guidance for its Staff on how to recognise and deal with bribery and corruption issues.

## 3. Executive Commitment to Prevention of Bribery and Corruption

**3.1** The Executive Board endorsement and commitment to this policy is through:

- Acknowledging the risks to which the company may be exposed in respect of bribery and corruption and ensuring the maintenance of the respective business risk assessment.
- Provision of resources (roles, responsibilities and systems) to maintain and implement the policy in line with legislation and best practice.
- Ensuring that requirements and responsibilities are set out in employment (staff and freelance) and supplier contracts.
- Establish an open culture for staff to raise concerns about and report any suspected or actual breaches.
- Training and briefing for all members of staff.
- Recording and acting on instances of bribery and corruption.
- Maintaining transparency of business practice, openly reporting upon its performance in respect of bribery and corruption.

## 4. Responsibilities under the policy



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- 4.1** The Company will promote its overarching view on avoiding bribery and corruption. This is one of zero-tolerance to bribery and corruption and any employee of the Company who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct.
- 4.2** In relation to non-employees and contractors engaged with the Company under any form of contractual relationship, we reserve our right to terminate such contracts in the event of breach of this policy and possible further legal action. As such we ensure that our terms of business with agents and contractors carry provision for avoidance of bribery and corruption.
- 4.3** All Staff have a role in the prevention and detection of bribery and corruption. Contracts of employment (staff and freelance) include specific clauses relating to conduct in respect of avoidance of bribery and corruption.
- 4.4** The Business Services and Compliance Team will undertake a periodic review of the risk assessment of the vulnerability of their operations in this area and the potential for bribery and corruption.
- 4.5** The Finance Department will retain financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties and provide a means for identifying financial irregularities that may indicate inappropriate behaviours under this policy.
- 4.6** All Staff must ensure that all hospitality or gifts, either received or given, fall within the Company's Gifts and Hospitality guidance (see Section 5.2). Where there is an element of doubt then this must be addressed with line management.
- 4.7** All Staff have a duty to declare any instances where there may be a conflict of interest in the operation or establishment of business relations with the Company.
- 4.8** All Staff have a duty to share any concerns they may have with the Company. For employees this will initially be with their line manager. Other third parties such as contractors should raise concerns with their Identity line manager. If a concern is related to the line manager it should be raised with one the Directors. The line manager may require further guidance which can be obtained from the Directors.

## **5. Information and guidance for employees and third parties on how to recognise and deal with bribery and corruption issues**

### Recognition and definition of bribery

A bribe is defined as an inducement or advantage offered, promised or provided in order to influence someone to act improperly. Improper performance entails breach of an obligation of good faith, impartiality or abuse of a position of trust. The bribe is normally to gain some form of commercial, contractual, regulatory or personal advantage.

Key aspects are that: -

The bribe can take the form of a financial or other advantage. In this context an advantage has its ordinary literal meaning.

The act of offering or requesting a bribe is enough to commit an offence. It does not have to be paid or received.

The bribe does not have to go to the person being influenced. A donation to a third party even a charity can be held to be a bribe.

The bribe does not have to be substantial. There is no materiality threshold in the Act.



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It is no defence to say that the payment was customary in that area of the world for that activity.

The definition of "foreign public official" includes not just members of foreign governments but such people as state sector employees such as civil servants, police, customs officials and providers of visas.

The following scenarios provide examples of how bribery or corruption may arise: -

## **A. Offering a bribe**

*An employee is undertaking work on the company's product compliance. The employee offers to pay multiple times the normal cost to a small local testing company to play down some defects in the product for which future sales benefiting the member of staff and the Company have been agreed.*

*This would be an offence as the employee is making the offer to induce the testing company to act improperly leading to an advantage (Financial remuneration and commercial benefit). The Company could also be found to have committed an offence of failing to prevent bribery as the offer has been made by an associated person to obtain business for the Company in addition to any personal benefit derived by the staff member.*

## **B. Receiving a bribe**

*A contractor/supplier gives a family member of an employee a job but makes it clear that in return they expect the employee to use his/her position to influence the chances of obtaining Company business or another advantage to them in return. It is an offence for a supplier to make such an offer. It would be an offence for the member of staff to accept the offer as it results in an advantage albeit for the benefit of a third party (the family member).*

## **6. Gifts and Hospitality**

The provision and receipt of gifts and hospitality helps the Company to promote business relationships and goodwill with its contacts and contractors. However, the Company recognises that lavish or excessive hospitality, either given or received, has the potential to infringe, or at the very least, raise a suspicion of impropriety.

This policy does not seek to prohibit the normal provision or receipt of gifts and hospitality to or from third parties provided it complies with the following guidance:

### **6.1.1** Staff must not accept any personal benefit as an inducement or reward:

- for taking any action (or specifically not taking action) in his or her position in the Company.
- to show favour (or disfavour) to anyone in his or her position in the Company.

### **6.1.2** The guiding principles are:

The conduct of individuals must not create suspicion of any conflict between their official duties and their private interests.

the actions of individuals in their official capacity must not give the impression (to any member of the public, to any organisation or to their colleagues) that they have been (or may have been) influenced by a benefit to show favour or disfavour to any person or organisation. In all dealings with commercial partners (or support organisations) the interests of the Company are paramount.

### **6.1.3** Staff may accept meals or equivalent hospitality only during the course of business. This may include meals at events such as breakfast seminars and working meals.



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- 6.1.4** All offers of gifts, other than those of a very small intrinsic value (for example branded stationery), must be declined.
- 6.1.5** Gifts of money or gift cards must always be refused.
- 6.1.6** Offers of hospitality or gifts, which may unduly influence, or be deemed by others to unduly influence, the actions of an individual in favour of the provider of the hospitality, or which are on a scale significantly greater than the Company would be likely to provide in return, must be refused. This includes attending sporting events, free trips and offers of accommodation.
- 6.1.7** All offers of hospitality or gifts must be recorded in the Hospitality and Gifts register available through iZone. This register will be used to identify individuals or companies who persistently offer inappropriate gifts or hospitality so that this can be addressed by the Directors. If staff are in any doubt, then they should report the offer.
- 6.1.8** Should a gift other any branded stationery be sent to or left for a member of staff without their acceptance then such a gift will become the property of the Company and must be recorded in the Hospitality and Gifts register available through iZone. A Director will be informed who will subsequently provide advice and guidance on how the gift should be used.
- 6.1.9** All Gifts or Hampers received at Christmas must be recorded and handed in to the Business Services and Compliance team who will facilitate the distribution of these in a fair way either through a staff ballot or raffle tickets where the proceeds will go to the Charity of Identity's choice.

## **7. Dealing with Possible Bribery Events**

The Company commits to deal with any issues of bribery and corruption through two key principles: -

All Staff are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage.

Where an employee has concerns, these should be raised initially with the employee's line manager. If those concerns involve the employee's line manager, then this can be escalated to the next line manager or Director as appropriate. Non-employees should approach the Directors directly.

The Company is committed to ensuring that no one suffers detrimental treatment because of reporting, in good faith, their suspicion that an actual or potential offence of bribery has taken place. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If an employee believes that he/she has suffered any such treatment, he/she should inform their line manager who will in turn inform the Directors. If the matter is not remedied, the employee may raise it formally using the Company's Grievance Procedures. Non-employees should approach the Directors directly.

## **8. Training of Identity Employees**

Under this policy, Identity provides training for all its employees in respect of bribery and corruption. This training is delivered as part of the standard induction package for new starters and re-taken annually thereafter. The training package covers, in brief, the following:



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- Understanding and showing commitment to the policy
- Understanding the different types of bribery and what could happen if an individual or organisation fails to prevent bribery.
- Learning about how bribery or corruption may happen in an organisation and its effects on the business and employees.
- Learning about the difference between a bribe and a gift, as well as the common indicators of a bribe.
- Learning what action to take if bribery or corrupt activity is suspected.

## 9. Management of Breaches

Identity undertake to handle in a consistent way any suspected or actual improper behaviours in respect of bribery and corruption:

- Maintain a Register of Breaches in respect of instances of bribery or corruption, recording the type of event, the details associated with the event and the actions taken as a result. This data will inform our risk assessment of vulnerability to bribery or corruption and implement appropriate preventive measures.
- Take all reports of suspected, attempted or actual events of bribery or corruption seriously and all such events will be investigated.
- Actions taken with individuals in respect of actual or attempted bribery or corruption will be progressed in accordance with the Grievance and Discipline procedures.
- Actions taken from a business standpoint to improve processes to detect, report, investigate, correct or otherwise manage suspected or actual events of bribery or corruption (or resulting effects) will be recorded in accordance with the non-conformity handling procedure.

## 10. Policy Monitoring, Reporting and Review

This Policy and the Risk Assessment evaluating vulnerabilities in respect of bribery and corruption will be reviewed every 2 years or following an attempted or actual bribery or corruption event, whichever is the sooner.

The Register of Breaches will be reviewed annually and a Report containing an overview of breaches and actions taken will be published.

**This policy has been approved & authorised by:**

**Name:** Ryan Perkins

**Position:** General Manager

**Date:** 01/03/2023

**Signature:**