	Document Title: <b>Anti-Bribery &amp; Corruption Policy</b>	
	Document Reference Number: 7	Authorised by: Bill Bowker
	Revision number: 0	Authority date: 1 <sup>st</sup> October 2017
	Page number: Page 1 of 2	

This policy applies to all WH Bowker Ltd and WH Bowker International Ltd, (the Company), Regional Distribution Centres and Logistic Services that include warehousing and transport operations within Great Britain.

It is the responsibility of the Directors to ensure this Policy is communicated to all persons in the organisation and other identified interested parties.

The Company has a zero-tolerance approach to bribery. Please also refer to the Staff Handbook.

This Policy sets out the Company's position on any form of bribery and corruption and provides guidelines aimed at ensuring compliance with anti-bribery laws, rules and regulations, not just within the UK but in any other country within which the Company may carry out its business or in relation to which its business may be connected.

### Legal Obligations

The UK legislation on which this Policy is based is the Bribery Act 2010 and it applies to the Company's conduct both in the UK and abroad. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

It is an offence in the UK to:


- Offer, promise or give a financial or other advantage to another person (i.e. bribe a person), whether within the UK or abroad, with the intention of inducing or rewarding improper conduct
- Request, agree to receive or accept a financial or other advantage (i.e. receive a bribe) for or in relation to improper conduct.
- Bribe a foreign public official.
- You can be held personally liable for any such offence.

It is also an offence in the UK for an employee or an associated person to bribe another person in the course of doing business intending either to obtain or retain business, or to obtain or retain an advantage in the conduct of business, for the Company. The Company can be liable for this offence where it has failed to prevent such bribery by associated persons. As well as an unlimited fine, it could suffer substantial reputational damage.

Bribery of any kind is strictly prohibited. Under no circumstances should any provision be made, money set aside or accounts created for the purposes of facilitating the payment or receipt of a bribe.

The giving of business gifts to clients, customers, contractors and suppliers is not prohibited provided the following requirements are met:

- The gift is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage.
- It complies with local laws.
- It is given in the Company's name, not in the giver's personal name.
- It does not include cash or a cash equivalent (such as gift vouchers).

	Document Title: <b>Anti-Bribery &amp; Corruption Policy</b>	
	Document Reference Number: 7	Authorised by: Bill Bowker
	Revision number: 0	Authority date: 1 <sup>st</sup> October 2017
	Page number: Page 2 of 2	

- It is of an appropriate and reasonable type and value and given at an appropriate time.
- It is given openly, not secretly and it is approved in advance by a Director of the Company.

In summary, it is not acceptable to give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given, or to accept a payment, gift or hospitality from a third party that you know or suspect is offered or provided with the expectation that it will obtain a business advantage for them.

### **Responsibilities and Reporting Procedure**

You must immediately disclose to a Director any knowledge or suspicion you may have that you, or any other employee or associated person, has plans to offer, promise or give a bribe or to request, agree to receive or accept a bribe in connection with the business of the Company.

The Company encourages all employees and associated persons to be vigilant and to report any unlawful conduct, suspicions or concerns promptly and without undue delay so that investigation may proceed and any action can be taken.

The Company will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. It is also committed to ensuring nobody suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or corruption offence has taken place or may take place in the future.

### **Record Keeping**

All accounts, receipts, invoices and other documents and records relating to dealings with third parties must be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off the record" to facilitate or conceal improper payments.

### **Sanctions for breach**

A breach of any of the provisions of this Policy will constitute a disciplinary offence and will be dealt with in accordance with the Company's disciplinary procedure. Depending on the gravity of the offence, it may be treated as gross misconduct and may render the employee liable to summary dismissal.

As far as associated persons are concerned, a breach of this Policy could lead to the suspension or termination of any relevant contract, sub-contract or other agreement.

This Policy shall be reviewed annually and updated as necessary and will be brought to the attention of all employees and other interested parties.

Signed:



**Bill Bowker**  
Director