

Anti-Bribery Policy

Integrity Communications Group values its reputation for ethical behaviour and recognises that trust and confidence in the propriety of its activities is essential to its continuing success. It is important that the Group, its employees and agents behave, and are seen to behave appropriately and honestly at all times.

The Group therefore aims to limit its risk of exposure to bribery by:

- Setting out a clear anti-bribery policy
- Encouraging its employees to report any suspicion of bribery
- Taking appropriate disciplinary action against any individuals found to be involved in bribery

The anti-bribery policy aims to:

- Protect the reputation of the Company
- Protect employees and agents of the Company from accusations of impropriety
- Ensure that all customers and suppliers are dealt with on an equal basis

The Company Prohibits the giving, the offering, the solicitation, or the acceptance of any cash, gifts, hospitality or other inducement or favour; to or from: any public or government body, public or government official, any company, firm, business or private individual; whether they are situated in the UK, or any other jurisdiction; by: any employee, agent, or any other business or individual acting on behalf of the Company; with the intention of: acquiring contractual or commercial advantage for the Company, or personal gain for the individual concerned, or anyone connected with the individual and said activity will be considered by the Group as a bribe and contrary to this Policy.

The Group recognises the importance of good relationships with both customers and suppliers, and this policy is not intended to prevent the giving and receiving of normal and appropriate hospitality, or the giving and receiving of token gifts. If any employee or individual is in doubt as the acceptability of any item, then the matter should be referred to the Chief Executive.

The Chief Executive is responsible for all anti-bribery measures within the Group.

The Group considers that compliance with this policy is essential to the protection of the Group's reputation and that of its employees, agents and representatives. Breach of this policy could leave the Group open to prosecution. Therefore, any employee who is found to have acted in breach of this policy or its aims may be subject to disciplinary action including summary dismissal where the breach amounts to gross misconduct.

Any employee, who suspects they may be the target of attempted bribery, or who suspects a work colleague of taking part in a bribe, is under a duty to report their concerns to the Chief Executive.



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Such report will be dealt with as a highly confidential matter. However, employees should also be aware that any deliberately malicious reports will become the subject of disciplinary action.

Chief Executive
Integrity Communications Group