

ADM – BRIBERY POLICY

The Bribery Act 2010 was introduced to update and enhance UK law on bribery including foreign bribery and applies to all UK and many non-UK corporate members of RICS.

Some key points to note

- *The Act came into force on 1 July 2011;*
- *The new corporate offence applies to UK companies and partnerships operating at home and overseas and to non-UK companies and partnerships which conduct part of their business in the UK;*
- *The Act applies to bribes paid anywhere in the UK and overseas;*
- *The Act creates strict liability offences which means that your organisation could be held criminally liable for failing to prevent a bribe being paid even if it did not know about the bribe;*

The penalties on conviction of a bribery offence have increased to:

- *Individual - 10 years' imprisonment and/or an unlimited fine;*
- *Commercial organisation - an unlimited fine and/or an EU wide ban in participation in public procurement.*
- *Directors convicted of bribery offences are also likely to be disqualified from acting as directors for significant periods.*

ADM Surveyors Limited have a zero tolerance policy on bribery, in view of this please be aware of potential situations that may arise while carrying out services for ADM Surveyors Limited.

This policy applies to all permanent and/or temporary staff employed by ADM Surveyors Limited, and any contractors, consultants or other persons acting under or on behalf of ADM Surveyors Limited.

ADM Surveyors Limited will not

- *Make contributions of any kind with the purpose of gaining any commercial advantage.*
- *Provide gifts or hospitality with the intention of persuading anyone to act improperly, or to influence a public official in the performance of their duties.*
- *Make, or accept, "kickbacks" of any kind.*

ADM Surveyors Limited will

- *Keep appropriate internal records that will evidence the business reason for making any payments to third parties. These records will be reviewed at monthly board meetings.*
- *Encourage employees to raise concerns about any issue or suspicion of malpractice at the earliest possible stage.*

- See that anyone raising a concern about bribery will not suffer any detriment as a result, even if they turn out to be mistaken.

Employees must not

- Accept any financial or other reward from any person in return for providing some favour.
- Request a financial or other reward from any person in return for providing some favour.
- Offer any financial or other reward from any person in return for providing some favour.

Gifts and Hospitality

This policy does not prohibit giving and receiving promotional gifts of low value, or normal and appropriate hospitality; providing they have been approved by the Directors of ADM Surveyors Limited.

Receiving Business gifts

- *Receiving promotional gifts of low value is normal and appropriate, however, gifts with a value exceeding £25.00 may not be accepted without approval. Any gift offered and then refused because of its value, must be reported to an ADM Surveyors Limited director.*

Offering Business gifts

- *Business gifts are primarily aimed at thanking customers and suppliers for their custom and loyalty, only authorised gifts may be given.*

Receiving Hospitality

The acceptance of corporate hospitality must be transparent; all invitations must be reported to the company before an employee accepts any invitation. The following areas are exempt while attending conferences, seminars, sponsored by third parties.

- *business and travel expenses incurred*
- *normal business lunches and meals*

Offering gifts and hospitality

- *ADM Surveyors Limited hospitality is primarily aimed at thanking customers and suppliers for their custom and loyalty. All hospitality events must have approval.*

Donations to organisations

- *No donations should be made to charities, political parties, or other organisations in the name of ADM Surveyors Limited without approval of an ADM Surveyors Limited Director.*

Non Compliance

Staff failing to observe Company policy may lead to disciplinary action in accordance with ADM Surveyors Limited's Disciplinary Policy.

Visitors

In the event of a breach of the policy by other organisations, or individuals, ADM Surveyors Limited will take appropriate action.

Monitoring Policy

The policy will be monitored on an on-going basis to ensure that it addresses issues effectively.

The following will be monitored:

- *That all individuals working for ADM Surveyors Limited are advised of the policy*
- *Assessment of any reported incident or related occurrence*

Monitoring of the policy is essential to assess how effective ADM Surveyors Limited has been to establish control of its obligations.

Definitions

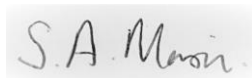
Bribe is a financial or other advantage offered or given to anyone to persuade them to or reward them for performing their duties improperly, or, with the intention of influencing them in the performance of their duties.

Hospitality is the practice of being hospitable, this includes the reception and entertainment of guests/visitors.

Kickbacks or facilitation payments are typically small payments made in return for a business favour or advantage.

ADM Surveyors Limited will undertake a proportionate risk assessment of the bribery risks that the company may face and monitor and review this at regular intervals.

Steven Masic
Managing Director



Sam Kenyon
Managing Director



Reviewed: December 2022