

Policy	Anti-Corruption and Bribery
Purpose	To ensure all employees are aware of the Company's obligation with regards to anti-corruption and bribery
Applies to	All Employees, Casual Workers, Agency Staff, Volunteers, Interns, Agents, Sponsors and any other person associated with the Company or any of its subsidiaries
Date Implemented	January 2015

1 Introduction

- 1.1 In this policy Arctics Ltd (trading as Igloo) is referred to as the 'Company'. For the avoidance of doubt these rules and procedures should be followed at all times at your individual location of work. In the event that you are placed at a clients' premises you should adhere to their own policies and procedures where they differ to the rules and procedures set out by Igloo.
- 1.2 This is a non-contractual policy and could be amended in line with business requirements. It is the Company's policy to conduct all of its business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate, and implementing and enforcing effective systems to counter bribery.
- 1.3 We will uphold all laws relevant to countering bribery and corruption. However, we remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both at home and abroad.
- 1.4 Bribery and corruption are punishable for individuals by up to ten years' imprisonment and if we are found to have taken part in corruption we could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation.
- 1.5 In this policy, **third party** means any individual or organisation you come into contact with during the course of your work for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

2 What is a Bribe?

- 2.1 A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

3 Gifts and Hospitality

- 3.1 This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties.

- 3.2 However if a gift is received or hospitality is provided or offered that is deemed to be generous, it is expected that the employee informs a Director before accepting the said gift or hospitality. If you are in any doubt as to whether hospitality constitutes 'generous hospitality' then you should seek the authority of a Director before committing yourself to it or agreeing to it.

- 3.3 The Directors of the Company will only give or receive gifts if the following requirements are met:

- it 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, or in explicit or implicit exchange for favours or benefits;
- it complies with local law;
- it is given in the Company's name;
- it does not include cash or a cash equivalent;
- it is appropriate in the circumstances. For example, in the UK it is customary for small gifts to be given at Christmas time;
- taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time;
- it is given openly, not secretly; and
- gifts will not be offered to, or accepted from, government officials or representatives, or politicians or political parties.

- 3.4 We appreciate that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable; it is the responsibility of the Directors to determine this. The intention behind the gift should always be considered.

4 Facilitation Payments and Kickbacks

- 4.1 We do not make, and will not accept, facilitation payments or "kickbacks" of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official.
- 4.2 If you are asked to make a payment on our behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided.
- 4.3 You should always ask for a receipt which details the reason for the payment. If you have any suspicions, concerns or queries regarding a payment, you should raise these with a Director.
- 4.4 Kickbacks are typically payments made in return for a business favour or advantage. All workers must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.

5 Donations

- 5.1 We do not make contributions to political parties. We only make charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made without the prior approval of a Director.

6 Your Responsibilities

- 6.1 You must ensure that you read, understand and comply with this policy.
- 6.2 The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 6.3 You must notify your Manager or appropriate person in charge as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.
- 6.4 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct.

7 Record-Keeping

- 7.1 We must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.
- 7.2 You must declare and keep a written record of all hospitality or gifts accepted or offered after authorisation has been given by a Director, which will be subject to managerial review.
- 7.3 You must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with our expenses policy and specifically record the reason for the expenditure.
- 7.4 All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

8 How to Raise a Concern

- 8.1 You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries, these should be raised with your line manager or appropriate person in charge. Concerns should be reported by following the procedure set out in our Whistleblowing Policy.

9 Protection

- 9.1 Workers who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

10 Who Is Responsible For The Policy?

- 10.1 The Directors have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

11 Monitoring and Review

- 11.1 The Directors will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible.
- 11.2 All workers are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.
- 11.3 This policy does not form part of any employee's contract of employment and it may be amended at any time.