

New Design Group takes any allegations of bribery very seriously. Employees are reminded that giving or accepting bribes is likely to be gross misconduct which can result in summary dismissal. The Purpose of this policy is to establish control to ensure compliance with all applicable anti-bribery and corruption regulations and to ensure that the Company's business is conducted in a socially responsible manner

#### Defining bribery:

The Bribery Act 2010 contains four possible offences:

1. Bribery – inducing someone to do something improperly by giving, offering or promising a reward
2. Being bribed – doing something improperly in return for a reward
3. Bribing a foreign public official
4. The corporate offence – this occurs when a company does not stop people who are operating on its behalf for being bribed or offering bribes

#### Responsibilities of the employer:

The senior manager responsible for monitoring any issues relating to bribery in this company is the financial controller. Any employees with questions or concerns relating to bribery should address their issues to this manager.

The senior manager responsible for monitoring issues relating to bribery will carry out risk assessments of any possible issues. Employees will be advised if their work gives rise to any particular concerns and will be advised how to address these issues. Employees must follow the advice and address any questions to the named manager.

All line managers are responsible for ensuring that new members of their team are made aware of the company policy relating to bribery as part of the induction process.

All line managers are responsible for ensuring that their team members have had the appropriate training about how to handle possible situations of bribery.

#### Responsibilities of the employee:

If an employee is offered a bribe s/he should refuse it. The employee must then report the situation immediately to his/her line manager, or the senior manager named as responsible for any issues relating to bribery.

The employee should follow up this notification by writing a statement explaining what occurred and how the employee responded.

Any employee who is found to have given or accepted a bribe is likely to have committed an act of gross misconduct. This could lead to summary dismissal.

Employees who are offered gifts or hospitality should refer the offer to their line manager.

Employees must declare and keep a written record of all hospitality, or gifts accepted or offered, which will also be subject to managerial review. No accounts must be kept "off book" or "off the record" to facilitate or conceal improper payments.

#### Monitoring & Review

The Company 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. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

All employees are responsible for the success of this policy and should ensure they use it to disclose and suspected danger or wrongdoing.

Employees are invited to comment on this policy and suggest ways in which it may be improved. Comments, suggestions and queries should be addressed to the Company Directors.

This policy does not form part of any employee's contract of employment and it may amended at any time.

9<sup>th</sup> July 2021

Due for review July 2022