

ANTI-BRIBERY POLICY

ECHO
HOUSE

**“If corruption is a disease,
transparency is a central
part of its treatment.”**

— Kofi Annan

ANTI-BRIBERY POLICY

PURPOSE

The purpose of this policy is to establish controls 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.

POLICY STATEMENT

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal or a breach of trust.

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

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption. We 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.

We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. However, we remain bound by the laws in the UK in respect of our conduct both at home and abroad.

Under the Bribery Act both the Company and individuals can be prosecuted for corruption and we therefore take our legal responsibilities very seriously.

SCOPE

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.

This policy applies to all individuals working for the company including employees, officers and directors, consultants, contractors and agency staff, wherever located (collectively referred to as employees in this policy).

This policy covers:

- Bribes;
- Gifts and hospitality;
- Facilitation payments;
- Political contributions;
- Charitable contributions.

ANTI-BRIBERY POLICY

BRIBES

Employees must not engage in any form of bribery, either directly or through any third party (such as an agent or distributor). Specifically, employees must not bribe a foreign public official anywhere in the world.

GIFTS AND HOSPITALITY

Employees must not offer or give any gift or hospitality:

- which could be regarded as illegal or improper, or which violates the recipient's policies; or
- to any public employee or government officials or representatives, or politicians or political parties; unless approved in writing by a Director of the Company.

Employees may not accept any gift or hospitality from our business partners if:

- it exceeds £50 in value for each individual gift or each hospitality event (not to exceed a total of £500 in any financial year), unless approved in writing by the employee's manager; or
- it is in cash; or
- there is any suggestion that a return favour will be expected or implied.

If it is not appropriate to decline the offer of a gift, the gift may be accepted, provided it is then declared to a Director and donated to charity or offered by lottery to all staff.

The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift should always be considered.

FACILITATION PAYMENTS AND KICKBACKS

Facilitation payments are a form of bribery made for the purpose of expediting or facilitating the performance of a public official for a routine governmental action, and not to obtain or retain business or any improper business advantage. Facilitation payments tend to be demanded by low level officials to obtain a level of service which one would normally be entitled to.

Our strict policy is that facilitation payments must not be paid.

In order to achieve our aim of not making any facilitation payments, each business of the Company will keep a record of all payments made, which must be reported to the Company Secretary, in order to evaluate the business risk and to develop a strategy to minimise such payments in the future.

POLITICAL CONTRIBUTIONS

We do not make donations, whether in cash or kind, in support of any political parties or candidates, as this can be perceived as an attempt to gain an improper business advantage.

CHARITABLE CONTRIBUTIONS

Charitable support and donations are acceptable, whether of in-kind services, knowledge, time, or direct financial contributions. We only make charitable donations that are legal and ethical. No donation must be offered or made without the prior approval of a Director.

ANTI-BRIBERY POLICY

EMPLOYEE RESPONSIBILITIES

All Echo employees must ensure that they read, understand and comply with this policy.

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 employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Employees must notify their manager or a Director as soon as possible if they believe or suspect that a conflict with or breach of this policy has occurred, or may occur in the future.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct.

RECORD-KEEPING

We must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

Employees must declare and keep a written record of all hospitality or gifts accepted or offered, which will be subject to managerial review.

Employees 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.

HOW TO RAISE A CONCERN

All employees are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If unsure whether a particular act constitutes bribery or corruption, or if employees have any other queries or concerns, these should be raised with their line manager or a Company Director.

WHAT TO DO IF AN EMPLOYEE IS A VICTIM OF BRIBERY OR CORRUPTION

It is important that employees tell the Company Secretary or the confidential helpline as soon as possible if they are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that they are a victim of another form of unlawful activity.

MONITORING AND REVIEW

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. 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 any suspected danger or wrongdoing.

REPORTING

CONFIDENTIAL HELPLINE - LAW AT WORK - 020 3170 6215.
Or, speak to an Echo House Director.

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020 8254 3434
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