



Anti-Bribery Policy

Aim: To ensure all staff are aware of guidelines relating bribery and gifts receiving as an individual as an employee and/or on behalf of AKP Ltd

Responsibility of process: Managing Director

Applicable to: All Staff

Introduction

AKP Ltd is a company that is committed to applying the highest standards of ethical conduct and integrity in its business activities. We take a zero tolerance approach to bribery and corruption by our employees or any other organisation or person who performs services with/to AKP Ltd.

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

We at AKP Ltd understand that from time to time business associates like to present employees with gifts as a token of gratitude for excellent service or such like and so have laid out the following guidelines for all employees to follow in these circumstances. All AKP Ltd employees must follow this set of guidelines both inside and outside of working hours if the transaction is in any way related to working with/for AKP Ltd and should always notify their line manager if any gifts are given/received at any time. Any employees found to be in breach of this policy may be subject to disciplinary action including dismissal.

Receiving Guidelines

Employees MAY accept gifts under the following circumstances:

- a- The gift offered is under £25 in monies value
- b- The gift does not include any cash, or actual monies (including gift cards)
- c- The gift has been previously given authorisation by managing director.

Employees MAY NOT accept gifts under the following circumstances:

- a- The gift offered is over £25 in monies value
- b- The gift contains any form of cash or actual monies (including gift cards)
- c- The gift has been specifically unauthorised by managing director
- d- The gift has been offered on the promise of a benefit or such like to the giving party

All gifts received by any employee of AKP Ltd in relation to the company must be reported to the managing director as soon as possible after receipt. If the managing director finds the gift to be unacceptable they have the right to return any gift to the giving party. If the managing director is not informed directly of the receipt of any gift, the employee in question may be subject to disciplinary action including dismissal.



Giving guidelines

All gifts given on behalf of AKP Ltd must have managing directors' approval and must be in line with the company to who the gift will be given anti-bribery policy.

Any employee found to be in breach of this may be subject to disciplinary action including dismissal.

Internal guidelines

Any gifts seen to be as a bribe given from employee to employee within AKP Ltd is strictly prohibited at all times. Any employee found to be in breach of this may be subject to disciplinary action including dismissal.