

## Anti-Bribery, Gifts & Hospitality policy

**On 1<sup>st</sup> July 2011 the UK Bribery Act 2010 came into force, with significant implications for organisations incorporated or formed in the UK. Project Resource Limited (Project Resource) adheres to a policy which is in-line with this Act.**

**To be clear, Project Resource prohibits** the offering, the giving, the solicitation or the acceptance of any bribe, whether cash or other inducement, **to or from** any person or company, wherever they are situated & whether they are a public official or body or private person or company, **by** any individual employee, agent or other person or body acting on Project Resource's behalf, **in order to** gain any commercial, contractual or regulatory advantage for Project Resource in a way which is unethical, **or in order to** gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.

Project Resource recognises that market practice varies across the world in which it does business & what is normal & acceptable in one place may not be in another. Our company policy prohibits any inducement which results in a personal gain or advantage to the recipient or any person or body associated with them, & which is intended to influence them to take action which may not be solely in the interests of Project Resource or of the person or body employing them or whom they represent.

This policy is not meant to prohibit the following practices providing they are customary in a particular market, are proportionate & are properly recorded:

- normal & appropriate hospitality;
- the giving of a ceremonial gift on a festival or at another special time; &
- the offer of resources to assist the person or body to make the decision more efficiently provided that they are supplied for that purpose only.

Inevitably, decisions as to what is acceptable may not always be easy. If anyone is in doubt as to whether a potential act constitutes bribery, the matter should be referred to the Director with responsibility for this policy before proceeding.

### **Employee Responsibility**

The prevention, detection & reporting of bribery is the responsibility of all employees throughout Project Resource. Employees or others can report confidentially any suspicion of bribery by emailing a Director directly at [info@project-resource.co.uk](mailto:info@project-resource.co.uk).