



ANTI-BRIBERY POLICY



MONARCH PARTNERSHIP
Utilities simplified

ANTI-BRIBERY POLICY

INTRODUCTION

The Monarch Partnership Ltd is committed to implementing and enforcing effective systems to counter bribery. Therefore, it is The Monarch Partnership Ltd's policy to conduct all aspects of its business in an honest and ethical manner at all times.

This policy applies to all individuals working for The Monarch Partnership Ltd, including anyone providing services to the company such as consultants or contractors.

POLICY AIM

The aim of this policy is to help The Monarch Partnership Ltd to act in accordance with the Bribery Act 2010, maintain the highest possible standards of business practice, and advise individuals of the Company's 'zero-tolerance' to bribery.

POLICY STATEMENT

This policy applies to all permanent and fixed-term staff employed by The Monarch Partnership Ltd, and any contractors, consultants or other persons acting under or on behalf of The Monarch Partnership Ltd.

The Monarch Partnership Ltd will not:

- Make contributions of any kind with the purpose of gaining any commercial advantage
- Provide gifts or hospitality with the intention of persuading anyone to act improperly, or to influence a public official in the performance of their duties
- Make, or accept, "kickbacks" of any kind

The Monarch Partnership Ltd will:

- Keep appropriate internal records that will evidence the business reason for making any payments to third parties.
- Encourage employees to raise concerns about any issue or suspicion of malpractice at the earliest possible stage.
- See that anyone raising a concern about bribery will not suffer any detriment as a result, even if they turn out to be mistaken.

EMPLOYEE RESPONSIBILITY

Employees must not:

- Accept any financial or other reward from any person in return for providing some favour
- Request a financial or other reward from any person in return for providing some favour
- Offer any financial or other reward from any person in return for providing some favour

GIFTS AND HOSPITALITY

This policy does not prohibit giving and receiving promotional gifts of low value, or normal and appropriate hospitality.

Receiving Business gifts:

- Receiving promotional gifts of low value is normal and appropriate, however, gifts with a value exceeding £25.00 may not be accepted without approval. Any gift offered and then refused because of its value, must be reported to senior management.

Offering business gifts:

- Business gifts are primarily aimed at thanking customers and suppliers for their custom and loyalty, only authorised gifts may be given.

Receiving hospitality:

The acceptance of corporate hospitality must be transparent; all invitations must be reported to senior management before an employee accepts any invitation. The following areas are exempt while attending conferences and seminars, sponsored by third parties.

- Business and travel expenses incurred
- Normal business lunches and meals

Offering gifts and hospitality:

- Company hospitality is primarily aimed at thanking customers and suppliers for their custom and loyalty. All hospitality events must have approval.

Donations to organisations:

- No donations should be made to charities, political parties or other organizations without approval.

NON-COMPLIANCE**STAFF**

Failing to observe company policy may lead to disciplinary action in accordance with The Monarch Partnership Ltd's disciplinary policy.

VISITORS

In the event of a breach of the policy by other organisations, or individuals, The Monarch Partnership Ltd will take appropriate action.

MONITORING POLICY

The policy will be monitored on an on-going basis to ensure that it addresses issues effectively.

The following will be monitored:

- That all individuals working for The Monarch Partnership Ltd are advised of the policy.
- Assessment of any reported incident or related occurrence.

Monitoring of the policy is essential to assess how effective The Monarch Partnership Ltd has been to establish control of its obligations.

DEFINITIONS

A **Bribe** is a financial or other advantage offered or given to anyone to persuade them to or reward them for performing their duties improperly, or with the intention of influencing them in the performance of their duties.

Hospitality is the practice of being hospitable, this includes the reception and entertainment of guests/visitors.

Kickbacks or facilitation payments are typically small payments made in return for a business favour or advantage.

REVIEWING POLICY

This policy will be reviewed and, if necessary, revised in the light of legislative or organisational changes. Improvements will be made by learning from experience and the use of an established annual review.

Signed: _____ Date: _____

Day-to-day responsibility for ensuring this policy is put into practice is delegated to:

NAME PRINTED IN CAPITALS

Policy Review Date:

Terms and Conditions of Use

The Monarch Partnership Ltd clearly understands the information provided is only a guide to good practice; it is up to each client to see that it meets the need of their particular circumstances or industry. In no way whatsoever should the information provided be taken as an interpretation of the law. Such an interpretation can only be given by employment tribunals and by the courts. Every reasonable effort has been made to ensure the accuracy of the information contained in this document; it may include the inaccuracies or typographical errors and will be changed or updated without notice.

Document Version	Date	Author	Approved by
Created v1	October 2009	Arjan Dosanjh	Peter Dosanjh
New Brand v1.1	June 2015	Jason Cross	Peter Dosanjh
New design v1.2	July 2017	Helmi Pikarinen	Peter Dosanjh



MONARCH PARTNERSHIP

Utilities simplified

THE MONARCH PARTNERSHIP

MONARCH HOUSE
7-9 STAFFORD ROAD
WALLINGTON,
SURREY
SM6 9AN

T: 020 8835 3535

F: 020 8835 3536

www.monarchpartnership.co.uk

marketing@monarchpartnership.co.uk

The Monarch Partnership Ltd
registered in England
(Reg No 4346309).
VAT Reg No: 793 6132 10.