



Anti – Bribery, Corruption and Conflict of Interest Policy

The [Bribery Act 2010](#), which came into force on 1 July 2011, makes it an offence for a UK national or person located in the UK to pay or receive a bribe, either directly or indirectly.

The Bribery Act covers transactions that take place in the UK or abroad, and both in the public or private sectors. Companies and partnerships can also commit an offence for failing to prevent bribery, where a bribe has been paid on their behalf by an "associated person".

"Associated persons" include employees, agents and any person performing services for or on behalf of the commercial organisation.

Bribery is the offer or receipt of any gift, loan, payment, reward or other advantage to or from any person as an encouragement to do something which is dishonest, illegal or a breach of trust, in the conduct of the Company's business.

Corruption is the misuse of entrusted power for private gain.

In the event that you believe that such activity outlined above is, or has, taken place then you must report any such approach as soon as is practicable to your supervisor or line manager.

On receipt of such information by the supervisor or line manager, then it will be referred directly to a director who will

- Assess the nature of the approach and
- Decide on the most appropriate course of action to be taken.

Such action may involve the approach being reported to the Police.

This document sets out the rules of the Company in relation to anti-bribery and corruption matters in the United Kingdom.

Compliance with the Company's policy in relation to bribery and corruption is regarded as part of employment obligations. A failure for any reason to follow the rules set out in this document this may result in disciplinary action being taken against you which could result in your dismissal.

Staff will not engage in activities which is contrary to UK anti-bribery and corruption legislation and carry punishment of up to 10 years in prison and/or an unlimited fine, with the Company also liable to an unlimited fine and Government sanction.

This policy document is not regarded as exhaustive but does give specific examples of situations and sets out the rules and procedures which should be followed.

If you are at any time uncertain as to whether your actions will comply with this policy, you must seek guidance from the Managing Director.

You should at all times act in accordance with the following provisions: -

- behave honestly, be trustworthy and set a good example;

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- use the resources of the Company in the best interests of the Company and do not misuse those resources;
- make a clear distinction between the interests of the Company and your private interests to avoid any conflict of interest, and if such conflict does arise you should report it to the Director immediately;
- ensure that any community support, sponsorship and charitable donations do not constitute bribery, and if in doubt you should consult the Managing Director;
- confidentially report all incidents, risks and issues which are contrary to this policy document to the Director;
- raise any issues regarding anti-bribery and corruption laws and the Company’s policies. Queries will be dealt with anonymously and a written response will be issued;
- Do not offer or accept bribes.
- Do not, without express prior written approval from the Managing Director, offer or accept any gifts or hospitality to or from clients, contractors, suppliers, other third parties or public officials.

Gifts are presents such as flowers, vouchers, food and drink. Event and travel tickets given to you as an individual are also gifts when they are not to be used in a hosted business context.

Hospitality includes invitations to hosted meals, receptions and events for business purposes.

Do not offer money to any public officials in order to speed up service or gain improper advantage. This type of bribery is a ‘facilitation payment’ and is illegal. If you are faced with a demand for a facilitation payment you must:

- Actively resist the payment;
- Inform the Managing Director.

The UK anti- bribery and corruption legislation applies to all activities of a UK-based business no matter where they are carried out in the world. This policy therefore applies to ALL activities worldwide, whatever the local law, practice or custom may be.

Conflict of interest

The identification of a conflict of interest centres upon integrity which is a fundamental value that employers seek in their employees. It is the hallmark of a person who demonstrates sound moral and ethical principles at work.

Integrity is the foundation on which co-workers build relationships, trust, and effective interpersonal relationships

Within all activity completed staff are required to ensure that any conflict of interest is identified as soon as practicable which is then reported to their line supervisor or line manager.

The line manager will then examine the potential conflict against Company policies and, as appropriate, make a direct referral to the client.

An entry will be made within the Conflict-of-Interest record sheet which will be completed by the interested party and line manager. A copy will be held within the ISO 9001:2015 complaints folder.

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If a conflict of interest is identified, then the staff member and client will be advised, and the staff member withdrawn from the service being offered.

Examples of a conflict of interest

- An employee reports to a supervisor who is a relative or close friend and has control over their job responsibilities, salary, and promotions.
- A male manager dates a female employee who reports to him or vice versa.
- A purchasing agent hires his brother-in-law to provide vending services to the company lunch areas.
- An employee starts a company that provides similar services to similar clients as those of her full-time employer.
- An employee who is a member of a company employee selection team fails to disclose that he is related to a job candidate whom the company team is considering for a position.
- A manager provides paid consulting services on the weekend to a company customer or supplier.
- An employee works part time in the evening for a company that makes a product that competes with the products of his full-time employer.
- A member of the company board of directors accepts fees and provides advice to a company that is in direct competition with the company on whose board of directors he sits.

This policy will be communicated to all staff via the Bright HR platform and further training on its content will be made available via the Atlas training portal.

It is the aim of P.A. Hollingworth & Co Ltd to ensure that this policy is properly implemented, monitored and periodically reviewed, in accordance with the relevant statutory provisions.

Signed: 

Name: Peter Hollingworth

Position: Director

Dated: 15th May 2024

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