



WEATHERPROOFING ADVISORS LTD

BRIBERY POLICY

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Signed.....(Frank Gaskell - Managing Director)

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1. INTRODUCTION

The Bribery Act 2010 came into force on 01 July 2011 creating a new offence which can be committed by commercial organisations if they knowingly take inducements from other companies in order to secure new or additional contracts.

The Weatherproofing Team Charter was established many years before the Bribery Act and sets out our 'Mantra' on trust and fidelity. Moreover the WPA Team Charter defines our purpose and values and what's important to us as a Company.

With the foregoing in mind we are intent on consistently demonstrating trust, honesty, openness and sharing best practice and in so doing this Policy on anti bribery is an extension of our Team Charter, our other Policies and Procedures and our Ethical Code of Conduct.

Our reputation management is critical to Weatherproofing's long term success as such it is vitally important that we

- 1.1** Protect our brand and our professional image
- 1.2** Strive to do the right thing in the right place at the right time
- 1.3** Take full responsibility for our personal actions regardless of circumstances or opportunity
- 1.4** Are transparent by providing clear and accurate documentation to every stakeholder
- 1.5** Never take a 'benefit in kind' in order to secure a contract
- 1.6** Never knowingly breach this or any other Policy
- 1.7** Apply good common sense and judgement driven by our Team Charter
- 1.8** Do not tolerate any retaliation against any employee who raises a concern or makes a report within the provision of 'Public Interest Disclosure' and our Equal Opportunities and Diversity Policy

2. SCOPE AND GENERAL PURPOSE

We strive to demonstrate the highest standards of integrity in the way we behave towards one another and to those outside the Company, especially our customers.

This Policy has therefore been established for the purposes of

- 2.1** Defining what is acceptable and what constitutes a serious breach or manipulation of our rules and procedures
- 2.2** Establishing full compliance with the law and our Procurement Policy and Procedures

2.3 Conducting periodic audits for the purpose of

2.3.1 Client tendering processes

2.3.2 Compliance with the Bribery Act 2010

2.4 Establishing a 'defensible' position should the Company ever be in a position where it is called to account for its actions or trading activities

3. BRIBERY WHAT DOES IT MEAN?

Simply put 'bribery' in any form means you take an 'inducement', a benefit in kind or some other incentive for something in return. In other words there is a 'Trade Off'.

Bribery in the work place is unacceptable. The Company will never be seen to accept a monetary reward or other gift which is wholly disproportionate to the order being placed by any client.

Similarly, we will not tolerate institutionalised secrecy or politicking for the purposes of gaining 'insider' knowledge. If you are a senior team Weatherproofer and have responsibility for submitting quotes and tenders you are responsible for

3.1 Meeting all and every tender requirement rules and procedures including any prequalification questionnaire which may be a pre-requisite to a full tender and/or the next stage of the process

3.2 Establishing and using the published facts and guidelines for the tender

3.3 Providing accurate information

3.4 Being wholly transparent

3.5 Full compliance with the agreed deadline date for submission

3.6 Behaving ethically and responsibly ensuring we never engage in dialogue which could

3.6.1 Lead to additional information being shared with you which other tendees have not been given resulting in WPA having unfair advantage over our competitors who are part of the same tendering process

3.6.2 Latent disregard and/or non compliance with the tendering process and potentially endangering WPA's reputation.

4. BRIBERY WHAT DOES IT LOOK LIKE

A bribe can be large or small though it is usually significant enough to make a difference usually because it is a 'reward' for giving a better or significantly reduced rate for something in return.

4.1 EXAMPLES OF BRIBES AND INDUCEMENTS:

4.1.1 Cash

4.1.2 Gifts of a disproportionate and lavish nature

- 4.1.3 Holiday or weekend away
- 4.1.4 Private hospitality
- 4.1.5 Entertainment and social activities such as private boxes at premier football matches

The foregoing is not an exhaustive list, it simply provides examples of the type of enticements which might be on offer if you concede to alternative ways of doing business. However, this Policy together with our Code of Ethics cannot provide solutions to every eventuality or every question you may have so it is not 'definitive' largely because we may find ourselves in a situation not defined hitherto but one which raises concern pursuant of the details contained in this document.

If you are ever found in a situation where you are asked to do something which:

- 4.1.6 You think is dubious or suspicious
- 4.1.7 You know is wrong
- 4.1.8 Which leads itself to a 'material' gain in any way shape or form
- 4.1.9 Which breaches this Policy
- 4.1.10 Which could potentially bring the Company into disrepute or seriously undermine or impugn our brand and thereto our trading integrity

You should follow our guidance on how to raise a formal complaint for unethical business practice or untoward behaviour and this can be found at Section 21 of our Equal Opportunities and Diversity Policy.

5. WHO DOES THIS POLICY APPLY TO?

Our Bribery Policy is ubiquitous and applies to everyone including

- 5.1 The Company Directors: Executive and Non-Executive
- 5.2 All our employees
- 5.3 Our customers
- 5.4 Our suppliers
- 5.5 Sub contractors and other third parties
- 5.6 Anyone working for and on behalf of Weatherproofing Advisors
- 5.7 Consultants
- 5.8 'Other' but that which is not defined above

6. RESPONSIBILITY MANAGERS

If you manage people within our business you are expected to fully comply with this policy by ensuring:

- 6.1 You never knowingly accept an inducement of any kind

- 6.2 Report any forced or unintentional action which could be manifestly defined as an inducement
- 6.3 Declare all and any gift or hospitality whether whole or in part to a Company Director
- 6.4 Ensure all team members declare all and any gifts or hospitality that they have been given including any Christmas gifts which a client may have bestowed on them
- 6.5 You ensure
 - 6.5.1 All new personnel to the Company are given a copy of this Policy during their induction training
 - 6.5.2 Provide every existing employee, contractors, third parties, sub contractors and all other stakeholders with any revised or updated version of the Policy
 - 6.5.3 Training is relevant and adequate to ensure the Company meets its legal obligations
 - 6.5.4 You provide adequate guidance, instruction and support to ensure full compliance with this policy
 - 6.5.5 Never judge or retaliate but to investigate and follow the procedure set out in this Policy

7. RESPONSIBILITY ALL OF US

We are all expected to

- 7.1 Know what a bribe is and why some actions may constitute a bribe and thereto a breach of this Policy
- 7.2 Learn about this Policy and comply with the content
- 7.3 Report any untoward behaviour that you've personally witnessed
- 7.4 Always seek advice and guidance especially when you are unsure about any of the following
 - 7.4.1 If you are being bribed for whatever purpose
 - 7.4.2 Someone has given you something and asks for something else in return
 - 7.4.3 You have been given a gift or money at any time during your employment with us
 - 7.4.4 Be alert and report any person you witness violating or breaching this Policy or our Code of Ethics
 - 7.4.5 Never judge or take matters into your own hands go straight to your Manager who will promptly deal with the situation
 - 7.4.6 Comply with the Law

8. GIFTS AND ENTERTAINMENT

Section 7 of this Policy covers our induction and collective responsibilities in regard to the Bribery Act 2010. However, the giving and receiving of gifts and entertaining clients have a role to play in building relationships with our customers.

It is important that we develop 'good will' with our customers and in so doing you may find we entertain certain clients as a 'thank you' for their loyalty. We do however undertake to exercise due diligence and proportionality so that it is not excessive or disproportionate but modest and defensible.

Similarly, the Company undertakes never to accept gifts or hospitality which is excessive or inappropriate and this Policy strictly prohibits cash alternatives or cash inducements.

Likewise, if Weatherproofing chooses to give gifts at Christmas as a token of our appreciation, they do so according to the following principles

- 8.1.1** It is of nominal value and not disproportionate
- 8.1.2** It displays Weatherproofing's Corporate branded logo when and if reasonably practicable to do so
- 8.1.3** It is recorded on our outgoing gift register

8.2 GIFT REGISTER

As a Company Weatherproofing Advisors Ltd undertake to ensure they keep a 'Gift Register' or all gifts given to clients and all gifts received as such it is vitally important that each and every one of us declares any gift or 'benefit in kind' so that we can record it as received by us. Similarly if you give a gift this must be recorded. The Gift Register will be held by our Quality Manager a copy of which can be found at Appendix 1 and 2.

The register will be kept yearly from January to December and the record kept for a minimum of 5 years.

8.3 BIRTHDAYS AND OTHER GIFTS

This Policy does not cover employees who wish to buy their colleague a personal gift. However, the Company does not encourage or condone pressurised 'gift collections'. Any collection must be purely voluntary and left to individual discretion.

8.4 EXCLUSIONS TO THE GIFT REGISTER

- 8.4.1** Birth and other occasions as noted above
- 8.4.2** Gifts of a nominal value such as promotional items

8.5 DECLARATIONS

With the exception of the exclusions as noted at point 8.4 we undertake to ensure:

- 8.5.1** That all gifts given and received are recorded

- 8.5.2 That all gifts exceeding a value of £50.00 from one entity are recorded on the Weatherproofing Advisors Record of Gifts and Entrainment Verification Register
- 8.5.3 You note any concerns you have in regard to the potential for untoward behaviour or
- 8.5.4 Where you believe this gift could lead to or imply any obligation on our part
- 8.5.5 You have given due consideration to the supply chain where and if relevant

8.6 PUBLIC SECTOR

Public Sector and Third Sector organisations follow very strict and stringent tendering processes as such it is quintessential that all persons responsible for Public or Third sector tenders:-

- 8.6.1 Follow the tender guidelines without deviation or contravention
- 8.6.2 Never knowingly get into a situation which could prejudice the tender or the Company
- 8.6.3 Be extra vigilant and decline any additional support, advice or intervention unless this forms, and is an integral part of, the tendering process
- 8.6.4 Never accept a gift or entertainment from any public sector employee, official or other associate
- 8.6.5 Declare all known employees, associates or 'other' contact if required and asked to do so
- 8.6.6 Never allow personal interests to conflict with business interest hence the need to comply with point 8.6.5 and thereto disclose any and all potential or actual conflicts of interest
- 8.6.7 Never offer gratuities or any other emoluments in order to supersede the tender process
- 8.6.8 Never allow personal or family connections or interests to lead us to do anything which is considered prejudicial to us and to you

9. AUDITING

Weatherproofing as a limited company undertake to:

- 9.1 Allow any relevant external authoritative body to audit our Gift and Entertainment Register
- 9.2 Produce copies of our Bribery Policy and Procedure where there is just cause and reason to do so
- 9.3 Internally audit our Gift and Entertainment Register no less than once a year
- 9.4 Auditors
 - 9.4.1 Internal Company Accountant and Head of Finance
 - 9.4.2 External Company's appointed Accountants
 - 9.4.3 Other As required by a specific client or an appointee of a client

We will demonstrate integrity and due diligence at all times so that the business is fairly and lawfully managed.

10. POLITICAL PERSUASION

At all times we undertake to maintain a 'neutral' position as such it is vitally important that you never allow your individual 'point of view' to manifestly influence your judgement to 'act' or sway any business transaction.

11. CHARITABLE DONATIONS, CONTRIBUTIONS AND OTHER

We are often asked to assist Charities and as a caring employer we take CSR very seriously (Community Social Responsibility). However, it is vitally important that we are discerning and careful that our actions are not taken out of context or misconstrued as such it is fundamental that you speak to the Chairman of the Company and in his absence the Managing Director if you are approached about making a donation.

Under no circumstances must you ever make any bequest without prior written consent from the Chairman or Managing Director.

12. TRAINING

Training shall be afforded in accordance without Training and Development Policy to ensure all provisions with this Policy are met.

13. WHISTLE BLOWING ON UNETHICAL BEHAVIOUR

If information comes to your attention or you witness behaviour which is prejudicial and in direct contravention with this policy you should raise the matter in accordance with Section 21 of our Equal Opportunities and Diversity Policy.

14. OTHER POLICIES AND PROCEDURES.

Our Bribery Policy works in tandem with the following Weatherproofing documents.

- 14.1 Disciplinary Policy and Procedure
- 14.2 Procurement Policy
- 14.3 Quality audit documentation
- 14.4 Code of Ethical Conduct and our Employee Handbook
- 14.5 Equal Opportunities and Diversity Policy

15. MONITOR AND UPDATE

We are committed to Monitoring the effectiveness of this Policy and to updating it on a periodic basis or at such time as required by changes to the law as such we all have a responsibility to check the document at regular intervals throughout the year.

If and when this Policy is updated it will supersede any previous test unless it is an additional clause or item.

This Policy was first established August 2012.

Appendix 1

INTEGRATED MANAGEMENT SYSTEM

HR33

Rev 0.0/Aug-12

WEATHERPROOFING ADVISORS LTD CORPORATE GIFT AND ENTERTAINMENT REGISTER - RECEIVED

YEAR _____

DATE	NAME OF COMPANY OR ORGANISATION	DESCRIPTION OF GIFT OR ENTERTAINMENT AND REASON FOR GIVING	VALUE OF GIFT	VALUE OF CLIENTS BUSINESS TO WPA	GIVEN TO (NAME OF RECIPIENT)	GIVEN BY (NAME OF COMPANY REPRESENTATIVE)	ACCEPTED (YES/NO)	COMMENTS

Appendix 2

INTEGRATED MANAGEMENT SYSTEM

HR33

Rev 0.0/Aug-12

WEATHERPROOFING ADVISORS LTD A RECORD OF ALL GIFTS AND ENTERTAINMENT GIVEN TO OUR CLIENTS

YEAR _____

DATE	DESCRIPTION OF GIFT OR ENTERTAINMENT AND REASON FOR GIVING	VALUE OF GIFT	VALUE OF CLIENTS BUSINESS TO WPA	NAME OF COMPANY OR ORGANISATION GIFT GOING TO	REASON FOR GIFT BEING GIVEN.	WHO GIVEN TO	WHO GIVEN BY @ WPA	COMMENTS