

# BIRKDALE

## Anti-Bribery and Corruption Policy

### Introduction

Birkdale Sales is committed to implementing and enforcing effective systems to counter bribery. Therefore, it is the Company 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 Company, including anyone providing services to the Company such as consultants or contractors.

### Policy Aim

The aim of the policy is to help Birkdale Sales to act in accordance with the Bribery Act 2010 and maintain the highest possible standard of business practice and advise individuals of the Company's zero tolerance to bribery.

### The Law

Under UK law (UK Bribery Act 2010), bribery and corruption is punishable for individuals by up to ten years imprisonment. If the Company is found to have taken part in the corruption or lacks adequate procedures to prevent bribery, it could face an unlimited fine and be excluded from tendering for Government contracts.

### Policy Statement

This policy applies to all permanent and fixed-term staff employed by Birkdale Sales and any contractors, consultants or other person/s acting or on behalf of Birkdale Sales .

Birkdale Sales 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.

### **Birkdale Sales**

Granville House  
The Heights Business Park  
Ibstone Road, Stokenchurch  
High Wycombe HP14 3BG

Telephone: 0345 450 9000

Fax: 0345 450 9085

Email: [mail@birkdalsales.com](mailto:mail@birkdalsales.com)

Web: [www.birkdalsales.com](http://www.birkdalsales.com)

Incorporated in England No. 5547795

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Birkdale Sales 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 & 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 a 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 the value, must be reported to a Director of Birkdale Sales.

Offering Business Gifts:

- Business gifts are primarily aimed at thanking customers and suppliers for their business and loyalty. Only authorised gifts may be given.

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## Receiving Hospitality:

The acceptance of corporate hospitality must be transparent; all invitations must be reported to a Director of Birkdale Sales before an employee accepts an invitation. The following areas are exempt while attending conferences or seminars sponsored by third parties.

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

## Offering Hospitality:

- Birkdale Sales is primarily aimed at thanking customers and suppliers for their business and loyalty. All hospitality events must have approval.

## Donations to Organisations;

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

## NON COMPLIANCE

### Staff

Failing to observe Birkdale Sales Policy may lead to disciplinary actions in accordance with Birkdale Sales Disciplinary Policy.

### Visitors

In the event of a breach of the Policy by other organisations or individuals, Birkdale Sales will take appropriate actions.

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## 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 Birkdale Sales are advised of The Policy.
- Assessment of any reported incident or related occurrence.

## 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.

## Policy Amendments

Should any amendments, revisions or updates be made to this policy, it is the responsibility of the Senior Partner of Birkdale Sales, to see that all relevant employees receive notice. Written notice and/or training should be considered.

**PRINT NAME:** John Abernethie

**SIGNATURE:**



**POSITION IN COMPANY:** Director

**DATE:** February 2020

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