



Anti – Bribery & Whistle Blowing Policy

Beaver Management Services Limited

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A. Introduction

Bribery is a criminal offence. BMSL prohibits any form of bribery. We require compliance from everyone connected with our business, with the highest ethical standards and anti – bribery laws applicable. Integrity and transparency are of the utmost importance to us and we have a zero tolerance attitude towards corrupt activities of any kind, whether committed by company employees or by third parties acting for or on behalf of the company.

B. Policy

It is prohibited, directly or indirectly, for any employee or person working on our behalf to offer, give, request or accept any bribe i.e. gift, loan, payment, reward or advantage, either in cash or any other form of inducement, to or from any person or company in order to gain commercial, contractual or regulatory advantage for the company, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.

C. Suspension

If we suspect that you have committed an act of bribery or attempted bribery, an investigation will be carried out and, in line with our disciplinary procedure where Appropriate, action may be taken against you who may result in your dismissal, or the cessation of our business arrangement with you.



D. Reporting

If you as an employee or person working on our behalf suspect that an act of bribery or attempted bribery has taken place, even if you are not personally involved, you are expected to report this to a Director. You may be asked to give a written account of events.

Staff are reminded of the company's whistle blowing policy which is available in the Employee Handbook.

E. Gifts & Hospitality.

We realise that the giving and receiving of gifts and hospitality as a reflection of friendship or appreciation where nothing is expected in return may occur, or even be commonplace, in our industry. This does not constitute bribery where it is proportionate and recorded properly.

No gift should be given nor hospitality offered by an employee or anyone working on our behalf to any party in connection with our business without receiving prior written approval from your Line Manager.

Similarly, all gifts, offers of hospitality or invitation to events etc. must be disclosed to your Line Manager. No gifts, invitations or offers of hospitality above the value of £50.00 should be accepted by an employee or anyone working on our behalf without receiving prior written approval from your Line Manager.

F. Record Keeping

A record will be made by the company of every instance in which gifts or hospitality are given or received.

As the law is constantly changing, this policy is subject to review and the company reserves the right to amend this policy without prior notice.

G. Whistle Blowers

If you believe that the company is involved in any form of wrongdoing such as

- 1) committing a criminal offence
- 2) failing to comply with a legal obligation
- 3) endangering the health and safety of an individual
- 4) concealing any information relating to the above

you should in the first instance report your concerns to the Managing Director who will treat the matter with complete confidence. If you are not satisfied with the explanation or



reason given to you, you should raise the matter with the appropriate organisation or body. E.g. the Police, the Environment Agency, Health & Safety Executive or Social Services Department.

If you do not report your concerns to the Managing Director you may take them direct to the appropriate organisation or body.

The Public Interest Disclosure Act 1988 prevents you from suffering a detriment or having your contract terminated for whistle blowing and we take very seriously any concerns which you may raise under this legislation.

We encourage you to use the procedure if you are concerned about any wrong doing at work. However, if the procedure has not been invoked in good faith (e.g. for malicious reasons in pursuit of a personal grudge), then it will make you liable to immediate termination of engagement or such lesser disciplinary sanction as may be appropriate in the circumstances.

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| Signed |  | Position: | Managing Director |
| Name | Tony Shipley | Date | January 2021 |