

## **CUMBERLAND ANTI-BRIBERY POLICY**

### **Introduction**

This policy sets out Cumberland's approach to the acceptance and handling of gifts to the Business as an entity, and to individual employees and Directors within it, which could be considered to be in return for favourable consideration (i.e. a bribe).

### **Definition of a Bribe**

In the United Kingdom under the Bribery Act 2010 an offence is committed where:

- A person offers a bribe
- A person accepts a bribe
- A bribe occurs and a business or partnership has failed to establish adequate procedures, policies or practices to prevent this.

A bribe is a financial or other advantage offered to induce a person to perform improperly, or to reward a person for doing so.

Please note that the offence is committed by either the person offering the bribe or the person accepting it, and includes any function of the business and any kind of employment such as a contractor, agency employee or full/part time employee.

### **Financial Gifts**

All financial gifts, non-financial gifts or incentives offered by customers or those associated with any business or commercial capacity must be declared, whether offered in a work context or outside work. Under no circumstances must an employee allow favourable consideration in return for an incentive. Employees accepting incentives must remove themselves completely from the management, consideration or decision-making process, which involves the donor.

### **The following general requirements will apply:**

- The requirement to be open and honest in any financial dealings with customers.
- Customers must not be encouraged to give, lend or bequeath money or gifts.
- Pressure must not be placed on customers or relatives of customers to make donations to people or the company.
- Employees must not ask for nor accept inducements, gifts or hospitality, which may be seen to affect judgements, nor should these be offered to colleagues.

The policy of this company is that all gifts or donations from customers, whether in cash or in goods, and made to the company, its directors, staff or spouses of these persons, are to be declared and entered into a Gifts Register. This will be reviewed by the CEO on a 6 monthly basis. In addition the following will apply to gifts given to individuals.

### **Gifts to Individuals**

- Employees and Directors are not permitted to accept personal cash gifts of any amount other than genuine professional fees.
- Employees and Directors may retain personal non-cash gifts offered by customers, which are of a 'trivial' nature – guide value up to £50.00.
- Personal non-cash gifts in excess of the guide value made to an individual should be politely refused.
- Cash gifts offered to individuals must be declined.

## **CUMBERLAND ANTI-BRIBERY POLICY**

### **Further Information**

For Cumberland Electrochemical Ltd employees in the United Kingdom further information concerning the full tax implications and provisions refer to the Inland Revenue Guideline SE21715 – Benefits: Gifts in Kind from Third Parties <http://www.hmrc.gov.uk/manuals/senew/SE21715.htm> Bribery Act 2010 (c. 23)