

Anti-bribery and corruption policy statement for INUI LED

1) Policy Statement



1.1 INUI is committed to applying the highest standards of ethical conduct and integrity in its business activities in the UK and overseas. Every employee and individual acting on INUI LED's behalf is responsible for maintaining our reputation and for conducting company business honestly and professionally.

1.2 We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate. 1.3 The purpose of this policy statement is to:

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a) set out our responsibilities, and of those working or providing services for us, (which for the purpose of the Bribery Act includes service providers of INUI LED), in observing and upholding our position on bribery and corruption;

b) provide information and guidance as to how we expect those working for us to conduct themselves and how to recognise and deal with bribery and corruption issues; and

c) how to raise concerns with us including any breaches of this policy statement. 1.3 INUI LED's Board and Executive Committee are committed to implementing and enforcing effective systems throughout INUI LED.

2) What is bribery?

A bribe, broadly, is an inducement or reward offered, requested, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. This can be in the context of giving or receiving. An offence is committed when the bribe is coupled with an intention of inducing, a reward for or in anticipation for a person to improperly perform their function or if the request, agreement to accept or acceptance of the bribe itself constitutes or is believed to constitute the improper performance of an activity. In addition, offering a bribe to a foreign public official to induce that public official to obtain or retain business or an advantage in the conduct of business (and that is not permitted by local laws), will also be an offence.

3) Responsibilities

3.1 The prevention, detection and reporting of bribery and other forms of corruption is the responsibility of all those working for us, or supplying services to us, or under our control. All INUI LED raise any concerns with us as set out in section 8.1

4) Gifts and Hospitality

4.1 INUI LED permits normal and appropriate corporate entertainment, gifts, hospitality and promotional expenditure (given and received) to or from third parties that is undertaken:

- a) for the purpose of establishing and maintaining good business relationships
- b) to improve the image and reputation of INUI LED
- c) to present INUI LED's goods/services effectively

Provided that it is:

- a) in good faith
- b) not offered, promised or accepted to secure an advantage for the its employees or associated persons or to influence the impartiality of the recipient

4.2 The giving of gifts by INUI LED employees with an approximate value of £50 or higher (or the local equivalent outside the UK) is prohibited unless they have been given prior approval by their Head of Department. With regard to our employees receiving gifts, unless approval has been provided by the appropriate Head of Department, gifts that exceed a £50 threshold must be declined and will be recorded. Gifts in the form of cash must never be accepted by our employees or service providers and therefore must not be offered and any offers of cash must be immediately reported to the relevant INUI LED Executive Committee member. The giving or receiving of promotional material is not considered a gift.

4.3 The giving and receiving of corporate entertainment and hospitality for our employees should not exceed an approximate value of £50 per head (or the local equivalent outside the UK) without prior approval by an INUI LED Executive Committee member where possible and reasonable to do so in the circumstances.

4.4 The test to be applied is whether in all the circumstances, the gift, entertainment or hospitality is reasonable and justifiable. We expect the intention behind the gift to always be considered.

5) What is not acceptable?

There are many scenarios where there will be a breach of the Bribery Act 2010, however below are some non-exhaustive scenarios as to we think is not acceptable for employees or service providers of INUI LED to do, namely:

- a) give, promise to give, or offer, a payment, gift or hospitality to a third party with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- b) give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure;
- c) give, offer or promise to a foreign public official to induce that public official to obtain or retain business or an advantage in the conduct of business (and that is not permitted by local laws), request, agrees to receive or accept payment from a third party knowing or suspecting it is offered with the expectation that it will obtain a business advantage for them;
- d) request, agrees to receive or accept payment from a third party knowing or suspecting it is offered with the expectation that it will obtain a business advantage for them) accept a gift or hospitality from a third party knowing or suspecting that it is offered or provided with an expectation that a business advantage will be provided by INUI LED in
- e) accept a gift or hospitality from a third party knowing or suspecting that it is offered or provided with an expectation that a business advantage will be provided by INUI LED in return;
- f) threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; and
- g) engage in any activity that might lead to a breach of this policy

6) Facilitation payments and kickbacks

6.1 We and our service providers should not make, and should not accept, facilitation payments or "kickbacks" of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a

government official. They are not commonly paid in the UK. Kickbacks are typically payments made in return for a business favour or advantage. We expect all employees and service providers must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.

6.2 If you are asked to make a payment on behalf of INUI LED, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt which details the reason for the payment.

6.3 Any transactions in contracts and documentation must be recorded so that there is never any attempt to hide the way a contract will work.

7) Record Keeping

7.1 We and our service providers are expected to keep financial records and have appropriate internal controls in place which will evidence the business reason for giving and/or receiving payments from/to third parties.

8) Raising Concerns

8.1 If you believe this policy has been breached, or suspect it may have been breached, in any way please contact INUI LED HR Director, christine@inui.co.uk

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