

Anti-Bribery and Corruption Policy

This policy covers the company approach to anti-bribery and corruption

INCIGHT Ltd (we, our, us) will conduct business in an honest and ethical manner and we take a zero-tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity in all business dealings and relationships.

We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we conduct business, including the UK Bribery Act 2010, which applies to conduct both in the UK and abroad.

We commit to maintaining effective due diligence prior to entering into significant business relationships to implement and enforce effective systems to counter bribery. We recognize that failure to do so may cause serious damage to the reputation and standing of INCIGHT.

Scope

All INCIGHT employees and others acting on behalf of INCIGHT must comply with this Anti-Bribery and Corruption Policy. This extends to all business dealings and transactions in the UK and in all countries in which INCIGHT operates. Any breach of the policy is likely to constitute a serious disciplinary, contractual and criminal matter for the individual concerned. This could constitute gross misconduct for which an offending employee may be dismissed without notice.

Gifts and hospitality

This policy does not prohibit normal and appropriate gifts and hospitality (given and received) to or from Third Parties unless otherwise specifically stated. However, any gift or hospitality:

- must not be made with the intention of improperly influencing a Third Party or Worker to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits.
- must comply with local law in all relevant countries.
- must be given in the name of the organisation, not in an individual's name
- must not include cash or a cash equivalent.
- must be appropriate in the circumstances.
- must be of an appropriate type and value and given at an appropriate time taking into account the reason for the gift; and must be given openly, not secretly.

Receiving gifts:

From time to time, clients, suppliers or other persons might offer a gift to staff. This could be a small item, or something of considerable value. INCIGHT appreciates that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another.

The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable both in the UK and any other relevant country. The intention behind the gift should always be considered. It is not acceptable for an employee (or someone on their behalf) to:

- accept payment from a Third Party where it is known or suspected that it is offered or given with the expectation that the Third Party will improperly obtain a business advantage
- accept a gift or hospitality from a Third Party where it is known or suspected that it is offered or provided with an expectation that a business advantage will be improperly provided by INCIGHT Ltd in return

INCIGHT applies the following rules;

- All gifts must be reported to the Director responsible for HR or the Managing Director and recorded in the Business Gifts and Hospitality Register.
- No gifts with a value of more than £50 may be accepted.
- If a gift is offered and then refused because of its value, this should also be reported to the Director responsible for HR or the Group Managing Director (MD).

Giving gifts, payments or hospitality

It is INCIGHT's custom to offer small gifts (e.g. pens, diaries) to clients, suppliers and other persons. All gifts over £50 can only be made with Director approval. A record must be kept of all gifts and hospitality for which director approval has been obtained.

INCIGHT may occasionally run hospitality events, primarily aimed at thanking clients and suppliers for their custom and loyalty. Staff must not organise any additional hospitality events without seeking authority from the Managing Director. It is not acceptable for any employee (or someone on their behalf) to:

- give, promise to give, or offer a payment, gift or hospitality with the expectation or hope that they or INCIGHT Ltd will improperly be given a business advantage, or as a reward for a business advantage already improperly given.
- 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.
- threaten or retaliate against another member of staff who has refused to commit a bribery offence or who has raised concerns under this policy; or engage in any activity that might lead to a breach of this policy.

Facilitation payment and 'kickbacks'

INCIGHT does not make, and will not accept, facilitation payments or “kickbacks” of any kind, such as small, unofficial payments made to secure or expedite a routine government action by a government official, or payments made in return for a business favour or advantage.

Charitable donations and sponsorship

INCIGHT only makes charitable donations and provides sponsorship that are legal and ethical under local laws and practices and which are in accordance with INCIGHT’s internal policies and procedures.

Record keeping

INCIGHT Ltd maintains appropriate financial records and has appropriate internal controls in place which evidence the business reason for gifts, hospitality and payments made and received.

Responsibilities and raising concerns

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for INCIGHT Ltd or under our control. All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Employees are required to notify INCIGHT Ltd as soon as possible if it is believed or suspected that a conflict with this policy has occurred, or may occur in the future, or if they are offered a bribe, are asked to make one, suspect that this may happen in the future, or believe that they are a victim of another form of unlawful activity.

Any concerns relating to a breach of the Policy should be reported to the Managing Director.

Communication and review

This policy will be communicated to staff via the Employee Handbook, during induction, and at staff meetings. This policy will be reviewed on a biennial basis. This policy will be communicated to any sub-contractor or associate persons working on behalf of INCIGHT Ltd.

Further information and guidance

This policy sets out the key principles which INCIGHT must adhere to. The Bribery Act 2010 can be viewed at: <http://www.legislation.gov.uk/ukpga/2010/23/contents?view=plain>

Mike Bladon

Managing Director, INCIGHT Ltd