



BRIBERY ACT POLICY

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Destroy All Previous Issues

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Approval

Version	Name	Position	Signature	Approved Date
V1.0	Exec	Executive Team		Jan 2012

Glossary

Term	Description

1 POLICY STATEMENT – ANTI BRIBERY

Bribery is a criminal offence. Badger does not, and will not, pay bribes or offer improper inducements to anyone for any purpose, nor do we, or will we, accept bribes or improper inducements.

To use a third party as a conduit to channel bribes to others is a criminal offence. Badger does not, and will not, engage indirectly in or otherwise encourage bribery.

Badger is committed to the prevention, deterrence and detection of bribery. We have zero-tolerance towards bribery. We aim to make anti-bribery compliance “business as usual”, rather than a one-off exercise.

2 BRIBERY

Is an inducement or reward offered, promised or provided to gain personal, commercial, regulatory or contractual advantage.

It is unacceptable to:

- Give, promise to give, or offer a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already 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
- Accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them
- Accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return
- Retaliate against or threaten a person who has refused to commit a bribery offence or who has raised concerns under this policy
- Engage in activity in breach of this policy

3 SCOPE OF THIS POLICY

This policy applies to all of Badger’s activities. For partners, joint ventures and suppliers we will seek to promote the adoption of policies consistent with the principles set out in this policy.

This policy covers all staff whether permanently or temporarily employed, agency staff, contractors, agents, members, directors or consultants.

4 GIFTS AND HOSPITALITY

Sample tokens of modest value bearing the name or insignia of the organisation giving to you (for example pens, diaries or calendars) may be retained unless they could be regarded as an inducement or reward. You should refuse any other offer or invitation (or return the gift) unless your line manager has advised you that it may be accepted or retained.

5 STAFF RESPONSIBILITIES

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for Badger or under its control. All staff are required to avoid activity that breaches this policy.

You must:

- Ensure that you read, understand and comply with this policy
- Raise concerns if you believe or suspect that a conflict with this policy has occurred, or may occur in future.

As well as the possibility of criminal prosecution, staff that breach this policy will face disciplinary action, which could result in summary dismissal for gross misconduct.

6 RAISING A CONCERN

If you have a concern regarding a suspected instance of bribery or corruption, please speak up – your information and assistance will help. The sooner you act, the sooner it can be resolved.

Please follow the Badger Whistle Blowing Policy, HR-38, for this purpose.