



Anti-Bribery and Anti-Corruption Policy

1. Introduction

- 1.1 Social's anti-bribery policy exists to set out our responsibilities, and those of individuals working for us, to uphold our zero-tolerance position on bribery and corruption. It also exists to act as a source of information and guidance for colleagues. It helps us recognise and deal with bribery and corruption issues, as well as understand our responsibilities.

2. Policy statement

- 2.1 Social is committed to conducting business in an ethical and honest manner, and to ensuring bribery is prevented. We have zero-tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships.
- 2.2 Social will uphold all laws relating to anti-bribery and corruption. We are bound by the laws of the UK, including the Bribery Act 2010, relating to our conduct.
- 2.3 Bribery and corruption are punishable by up to ten years of imprisonment and a fine. If our company is discovered to have taken part in corrupt activities, we may be subject to an unlimited fine, be excluded from tendering for public contracts, and face serious damage to our reputation.

3. Who is covered by the policy?

- 3.1 This anti-bribery policy applies to all colleagues (whether temporary, fixed-term, or permanent), consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, agents, sponsors, or any other person or persons associated with us (including third parties). The policy also applies to our Board.
- 3.2 Third party refers to any individual or organisation our company meets and works with. It refers to actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies – this includes their advisors, representatives and officials, politicians, and public parties.

4. Definition of bribery

- 4.1 Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision.
- 4.2 A bribe refers to any inducement, reward, or object/item of value offered to another individual in order to gain commercial, contractual, regulatory, or personal advantage.

- 4.3 Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law.
- 4.4 Bribery is illegal. We must not engage in any form of bribery, whether it be directly, passively (as described above), or through a third party (such as an agent or distributor). We must not accept bribes in any degree and if we are uncertain about whether something is a bribe or a gift or act of hospitality, we must seek further advice from our line manager or a Director.

5. What is and what is NOT acceptable

- 5.1 This section of the policy refers to 4 areas: gifts and hospitality; facilitation payments; political contributions; and charitable contributions.

5.2 Gifts and hospitality

Social accepts normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts meets the following requirements:

- a. It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits.
- b. It is not made with the suggestion that a return favour is expected.
- c. It is in compliance with the law.
- d. It is given in the name of the company, not in an individual's name.
- e. It does not include cash or a cash equivalent (*e.g.* a voucher or gift certificate).
- f. It is appropriate for the circumstances (*e.g.* giving small gifts around Christmas or as a small thank you to a company for helping with a large project upon completion).
- g. It is of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift.
- h. It is given/received openly, not secretly.
- i. It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.
- j. It is not above a certain excessive value (usually in excess of £100).
- k. It is not offered to, or accepted from, a government official or representative or politician or political party.

Where it is inappropriate to decline the offer of a gift (i.e. when meeting with an individual who may take offence), the gift may be accepted so long as it is declared to your responsible Director, who will assess the circumstances.

As good practice, gifts given and received should always be disclosed to your responsible Director. Gifts from suppliers should always be disclosed.

5.3 Facilitation Payments and Kickbacks

Social does not accept and will not make any form of facilitation payments of any nature. We recognise that facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action.

We do not allow kickbacks to be made or accepted. We recognise that kickbacks are typically made in exchange for a business favour or advantage.

5.4 Political Contributions

Social will not make donations, whether in cash, kind, or by any other means, to support any political parties or candidates. We recognise this may be perceived as an attempt to gain an improper business advantage.

5.5 Charitable Contributions

Social encourages the act of donating to charities – whether through services, knowledge, time, or direct financial contributions (cash or otherwise) – and agrees to disclose all charitable contributions it makes.

Employees must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery. We will ensure that all charitable donations made are legal and ethical.

6. Our responsibilities as employees

6.1 As employees of Social we must all ensure we read, understand, and comply with the information contained within this policy, and with any training or other anti-bribery and corruption information we are given.

6.2 All employees and those under our control are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this anti-bribery policy.

6.3 If you have reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, you must notify your responsible Director or a Group Director.

6.4 If any employee breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct. Social has the right to terminate a contractual relationship with an employee if they breach this anti-bribery policy.

7. What happens if I need to raise a concern?

7.1 This section of the policy covers 3 areas: how to raise a concern; what to do if you are a victim of bribery or corruption; and protection.

7.2 How to raise a concern (sometimes known as “whistleblowing”)

If you suspect an instance of bribery or corrupt activities you are encouraged to raise your concerns at the earliest possible stage. If you’re uncertain about whether a certain action or behaviour can be considered bribery or corruption, you should speak to your line manager, your responsible Director or a Group Director.

7.3 We will familiarise all our employees with these whistleblowing procedures so employees can voice their concerns swiftly and confidentially.

7.4 What to do if you are a victim of bribery or corruption

You must tell your line manager or a Director as soon as possible if you are offered a bribe by anyone, if you are asked to make one, if you suspect that you may be bribed or asked to make a bribe in the near future, or if you have reason to believe that you are a victim of another corrupt activity.

7.5 Protection

If you refuse to accept or offer a bribe or you report a concern relating to potential act(s) of bribery or corruption, we understand that you may feel worried about potential repercussions. Social will always support anyone who raises concerns in good faith under this policy, even if investigation finds that they were mistaken.

We will ensure that no one suffers any detrimental treatment as a result of refusing to accept or offer a bribe or other corrupt activities or because they reported a concern relating to potential act(s) of bribery or corruption. Detrimental treatment refers to dismissal, disciplinary action, treats, or unfavourable treatment in relation to the concern the individual raised.

If you have reason to believe you've been subjected to unjust treatment as a result of a concern or refusal to accept a bribe, you should inform your line manager or the compliance manager immediately.

8. Training and communication

- 8.1 Social will provide training on this policy as part of the induction process for all new employees. Employees will also receive regular, relevant training if necessary on how to adhere to this policy.
- 8.2 Social's anti-bribery and corruption policy and zero-tolerance attitude will be clearly communicated to all suppliers, contractors, business partners, and any third-parties, as appropriate.

9. Monitoring and reviewing

- 9.1 Social's Group Director of Operations is responsible for monitoring the effectiveness of this policy and will review the implementation of it on a regular basis. They will assess its suitability, adequacy, and effectiveness.
- 9.2 Any need for improvements will be applied as soon as possible. Employees are encouraged to offer their feedback on this policy if they have any suggestions for how it may be improved.

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