


Title	JT006: Anti-Bribery & Anti-Corruption Policy			
Revision	2			
Status	Released			
Master Location	F:\Data1\AW_POLICIES\AntiBriberyAndCorruption\JT006_ABAC			
Owner	Adam Lloyd	Managing Director		
Approved by				
Creation Date	13/04/2015	Latest Revision Date	09/02/2017	

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

Jointing Technologies

1. Purpose

The purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery and corruption regulations, and to ensure that the Company's business is conducted in a socially responsible manner.

2. Policy statement

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.

We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. However, we remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both at home and abroad.

Bribery and corruption are punishable for individuals by up to ten years' imprisonment and a fine. If we are found to have taken part in corruption, we could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation. We therefore take our legal responsibilities very seriously.

3. Scope

In this scope of this policy covers any individual or organisation you come into contact with during the course of your work for Jointing Technologies; and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

4. Policy Application


This policy applies to individual employees, agents, sponsors, intermediaries, consultants or any other people or bodies associated with Jointing Technologies and its employees. Bribery is committed when an inducement or reward is provided, in order to gain any commercial, contractual, regulatory or personal advantage for Jointing Technologies or another party.

No bribes of any sort may be paid or accepted from customers, suppliers, politicians, government advisors or representative's private person or Company. It is not permitted to establish accounts or internal budgets for the purpose of making facilitation bribes or influencing transactions (slush funds).

Jointing Technologies recognises that to refuse a gift in certain circumstances would cause offence to our trading partners. The test to be applied in all circumstances is whether the gift or entertainment is reasonable and justifiable.

What is the intention of the gift? Is the gift being offered for something in return (quid pro quo).

This Policy does not prohibit the following practices providing they are customary in a particular market, or are appropriate and properly recorded. (Please refer to our code of conduct on gifts and entertainment policy for further information).

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- Normal and appropriate hospitality (given or received). The giving of ceremonial gifts on a festival or at another special time, up to and not exceeding the value of 100GBP or 100 Euros

5. Employee Responsibility

The presentation, detection and reporting of bribery is the responsibility of all employees throughout the Company.

Suitable channels of communication by which employees or others can report confidentially any suspicion of bribery, which will be maintained through via Whistle Blowing - see information below.

6. Reporting incidents of Bribery and Corruption.

If you become aware that an activity or conduct which has taken place which you suspect is a bribe (or corrupt) you have a duty to report this. Any such incidents should be reported to your manager or, you should follow the Whistle Blowing contacts.

7. Whistle Blowing - Who to Contact

For further information please call your immediate manager.

For further clarification, please contact:

Jon Kay on Tel: 01273 770576 or Email: jon.kay@jointingtech.co.uk

This policy does not form part of any employee's contract of employment and it may be amended at any time.