

Anti-Bribery Policy



Together

We are **Clemark Group**,

Registered in England & Wales under **Associate Enterprises Limited** and including all wholly owned subsidiaries. We also trade as Assent, Lorators, Clemark.

Our integrated management system covers the provision of consultancy, auditing, training, creative, technology and other professional services delivered in-person and remotely to ensuring the quality of products/services and the security of all information.

Introduction

We strive to conduct our business with transparency and fairness, and in compliance with the law.

The following anti-bribery policy has been agreed by the board and applies to all employees, sub-contractors and other interested parties.

Compliance with the Law

The UK Bribery Act 2010 makes it is illegal to offer, promise, give, request, agree, receive or accept bribes.

In general, any of the above that may cause a person to improperly perform a function or activity resulting in an advantage to the other party would not be acceptable.

Accepting Gifts, Hospitality and Donations.

Genuine hospitality it not forbidden but for the purposes of transparency the following rules apply:

- Any hospitality, gift or other incentive that is given contrary to the act and as referenced above is prohibited.
- All corporate gifts and hospitality from suppliers, customers or others must be declared to the board prior to acceptance.
- The board will review gifts and hospitality on a case-by-case basis and respond.

The company accepts that maintaining good business relationships is essential to the success of the company.

Conducting Business.

In conducting the activities of the business, all parties should be aware of this policy and their obligations under the Bribery Act 2010.

The integrity of the company is of paramount importance and any loss of integrity could causes serious reputational damage, in addition to financial and criminal sanctions under the Act.

All business transactions and communications must be clearly defined between the parties involved, and there should always be an audit trail to support the decisions made, to ensure that they have been made with integrity.

Managing Conflicts of Interest

Occasionally a conflict of interest may occur, for example (but not limited to):

- The supplier or customer contact point is a relation or close friend to you.
- You have a direct or indirect financial interest in the supplier or customer organization.

- You have a contractual relationship with the supplier or customer outside of work – for example you have taken services from them in your personal life.
- The information exchanged during the business transaction relates to you, your family or close friends.

In this event you should, if practicable, continue no further with the transaction and immediately report the conflict to your line manager.

Several options will then be available including:

- Handing the transaction or business to another colleague who is not compromised.
- Continuing the transaction or business under increased supervision.

Whistle-Blowing

There is no example where bribery is considered acceptable business practice and all staff have a responsibility to report suspected occurrences to an appropriate independent source such as a line manager or director.

Reports are investigated in confidence.