

ANTI-BRIBERY GIFTS & HOSPITALITY POLICY

Policy Statement: McSence Group is committed to implementing and enforcing effective systems to counter bribery where it is the Company's policy to conduct all aspects of its business in an honest and ethical manner at all times. The aim and purpose of this policy is to help the McSence Group act in accordance with the Bribery Act 2010, maintain the highest possible standards of business practice, and advise individuals of the company's 'zero-tolerance' to bribery where the Group will:

- ✦ Keep appropriate internal records that will evidence the business reason for making any payments to 3rd parties.
- ✦ Encourage employees to raise concerns which includes evoking the company's whistleblowing policy in regard to any issue or suspicion of malpractice at the earliest possible stage.
- ✦ Ensure that anyone raising a concern about bribery will not suffer any detriment as a result, even if they turn out to be mistaken.

All Employees: This policy applies to all persons working for or on our behalf of the McSence Group of Companies which includes the subsidiary companies - *McSence Communication Ltd, McSence Ltd, McSence Services Ltd & McSence Workspace Ltd* in any capacity including but not limited to:

- ✦ All employees at all levels, prospective employees, agency workers, seconded workers, temporary workers, contractors/sub-contractors, clients, agents, external consultants, volunteers, members of the public, group's supply chain, third-party representatives and/or business partners who will be referred to in our Group policies as "all employees".

The Workplace: This policy applies to all persons working for or on our behalf of the McSence Group of Companies in any capacity at the workplace(s) as defined below which includes but not limited to:

- ✦ McSence Premises, Offices, Units, Business Park, Client's Premises, External Meeting Places, Customers' Homes, Gardens, Sheltered Housing, Whilst On-Call, On-Duty, Emergency Cover, Working from Home including On-Line Meetings, Whilst Driving in Company Time, Working Public Areas (café's, trains, coffee shops, buses etc) and will be referred to throughout this policy as "the workplace".

The Law: Under UK law (UK Bribery Act 2010), bribery and corruption are punishable for individuals by up to ten years imprisonment. If the McSence Group is found to have taken part in the corruption or lacks adequate procedures to prevent Bribery, it could face an unlimited fine and be excluded from tendering for Government or other contracts.

Employee Procedures: Employees must not:

- ✦ Accept any financial or other reward from any person in return for providing some favour.
- ✦ Request a financial or other reward from any person in return for providing some favour.
- ✦ Offer any financial or other reward from any person in return for providing some favour.

Definitions: Below outlines the general definitions but not limited to:

- ✦ **Bribe** is a financial or other advantage offered or given to anyone to persuade them to or reward them for performing their duties improperly, or, with the intention of influencing them in the performance of their duties.
- ✦ **Hospitality** is the practice of being hospitable, this includes the reception and entertainment of guests / visitors.
- ✦ **Kickbacks** or facilitation payments are typically small payments made in return for a business favour or advantage.

Promotional Gifts and Hospitality: This policy does not prohibit giving and receiving promotional gifts of low value, or normal and appropriate hospitality as outlined below:

Offering and Giving Business gifts:

- ✦ Business gifts are primarily aimed at thanking customers and suppliers for their custom and loyalty.
- ✦ Only gifts authorised by your Line Manager and approved by Senior Management Team (SMT) may be given.

Receiving Business gifts are:

- ✦ Receiving promotional gifts of low value is normal and appropriate.
- ✦ All gifts of or offers of money or cash equivalents (e.g., gift vouchers, lottery tickets) should be politely declined.
- ✦ Low value gifts (non-monetary) are ones with a value not exceeding £15.00 and can be accepted without approval by your Line Manager but line manager must be informed in writing, email is acceptable.
- ✦ Gifts exceeding the value of £15.00, or where the value is unknown, may only be accepted with approval by your Line Manager.
- ✦ Any gift offered and then refused because of its value, must be reported to your Line Manager.

Receiving Hospitality:

- ✦ The acceptance of corporate hospitality must be transparent.
- ✦ All invitations must be reported to the company via your Line Manager before an employee accepts any invitation.
- ✦ Normal business lunches and meals are exempt while attending conferences, seminars, sponsored by third parties.

Offering gifts and hospitality:

- ✦ Company hospitality is primarily aimed at thanking customers and suppliers for their custom and loyalty.
- ✦ All hospitality events must have approval by your Line Manager.

Donations to organisations:

- ✦ No donations should be made to charities, political parties, or other organisations without authorisation by your Line Manager and approved by Senior Management Team (SMT)

Non-Compliance: Failing to observe the company's Bribery Policy has potential actions as outlined below:

- ✦ Employees failing to observe Anti Bribery policy may lead to disciplinary action in accordance with the Company's Disciplinary Policy
- ✦ Other organisation including contractors, consultants, visitors, or other persons acting under or on behalf of the company where in the event of a breach of the policy by other organisations, or individuals, the company will take appropriate action which may result in the termination of services and/or contract.

Monitoring Policy: Monitoring of the policy is essential to assess how effective the company has been to establish control of its obligations. The policy will be monitored on an on-going basis to ensure that it addresses issues effectively where the following will be monitored:

- ✦ That all individuals working for the company are advised of the policy
- ✦ Assessment of any reported incident or related occurrence
- ✦ The maintenance of record keeping via monthly reports updates from each department.

Company Intranet – Staff Zone: All the McSence Groups policies, procedures, handbooks are available on-line to all employees on the McSence Group's Staff Zone Intranet via our website [Login | McSence](#)

Compliance: Failure to comply with the provisions of this Policy may result in Disciplinary proceedings.



McSence Group Signatory:

David Maxwell | Chief Executive

McSence Group - McSence Communication Ltd, McSence Ltd, McSence Services Ltd & McSence Workspace Ltd

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Policy Amendments & Revisions: *This policy will be reviewed annually and, if necessary, revised in the light of legislative or organisational changes. Improvements will be made by learning from experience and the use of an established annual review. Should any amendments, revisions, or updates be made to this policy it is the responsibility of the Company Senior Management Team (SMT) to see that all relevant employees receive notice and training if necessary.*

POLICY