

# Labotek GB Limited

## Anti-Bribery Policy

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Anti-Bribery Policy
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## Summary

Bribery undermines democracy and poses a serious threat to sustained economic progress, The Bribery Act of 2010 addresses this risk.

Our organisation adopts a risk based approach to managing bribery risks and our procedures will be proportionate to the risks faced by our organisation. This policy is not designed to detect or prevent all bribery, however, our approach will recognise that there is a viable threat across our business sector via our transactions and business relations.

We follow the recommendations made here:

[Bribery Act 2010 guidance - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

The Bribery Act of 2010 (The Act) has created 4 offences that can be committed by an individual or corporately:

- *Promising or offering a bribe*
- *Requesting to receive a bribe, agreeing to receive a bribe, or actually accepting a bribe*
- *Bribing a foreign public official*
- *The corporate offence of failure to prevent a bribery with an organisation*

This policy will address the main areas of liability that fall under The Act: our employees and associated persons have the responsibility to understand the consequences of any breaches of this policy and we will give them information and guidance on how to recognise any bribery or corruption issues.

## **How is Bribery classed?**

A bribe is a reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

It is a criminal offence under the Bribery Act 2010 if:

- an employee or associated person acting for, or on behalf of, the Labotek GB offers, promises, gives, requests, receives or agrees to receive bribes; or
- an employee or associated person acting for, or on behalf of, Labotek UK offers, promises or gives a bribe to a foreign public official with the intention of influencing that official in the performance of his/her duties; and
- Labotek GB does not have the defence that it has adequate procedures in place to prevent bribery by its employees or associated persons.

*It is not the intention of the Policy to prevent the following activities:*

- normal and appropriate hospitality;
- the giving and receiving of modest gifts. These must be proportionate, reasonable and made in good faith and not place any expectation on the recipient to reciprocate either in like or by performing, or failing to perform, any other task in return.

## **Staff responsibilities:**

To read, understand and comply with this Policy.

The prevention, detection and reporting of bribery and other forms of corruption.

To notify our UK Director and our Director as soon as possible if they believe or suspect that a conflict with this Policy has occurred or may occur in the future.

Any employee who breaches this Policy will face further action as described in our disciplinary procedures.

Individuals are encouraged to raise concerns about any instance or suspicion of malpractice as early as possible. If you are unsure whether a particular act constitutes bribery, or if you have any other queries, these should be raised with our UK Director.

Any breach of this Policy is likely to constitute a serious disciplinary, contractual and criminal matter for the individual concerned and may cause serious damage to the reputation and standing of Labotek GB.

Labotek GB may terminate the contracts of any associated persons, including consultants or other workers who act for, or on behalf of us who are found to have breached this Policy.

Employees and other individuals acting for Labotek GB should note that bribery is a criminal offence that may result in up to ten years' imprisonment and/or an unlimited fine for the individual and an unlimited fine for the organisation. Labotek GB will provide all necessary assistance to the relevant authorities in any subsequent prosecution.

## Risk Assessment:

Risk	Action
Gifts and hospitality	<p>No member of staff shall be in receipt of gifts, excessive hospitality or any other inducement from a supplier or potential supplier of goods, materials or services to Labotek GB.</p> <p>All members of staff must adhere to these procedures, to ensure the highest possible standards.</p> <p>Staff should be aware that reports of receipts of gifts and/or excessive hospitality can possibly lead to prosecutions for corruption.</p> <p>Staff who are in a position to award a contract or recommend contractors must not work with any such supplier on a personal basis.</p>
Overseas	<p>Our suppliers overseas shall work in line with Labotek GB's commitment to an anti corruption culture, respecting that bribery is never acceptable.</p> <p>This includes the giving or receiving of gifts and hospitality that could influence or be perceived to influence a contractual or material transaction.</p> <p>This will be part of an ongoing dialogue with agents and we should establish some training/development as appropriate, through processes and regular checks that bring engagement with anti-bribery and corruption to life, perhaps through website materials made easily accessible.</p>
Procurement	<p>Employees and where applicable, associated persons, are required to take particular care to ensure that all records are accurately maintained in relation to any contracts or business activities, including purchase orders, tenders, financial invoices.</p> <p>All payment transactions with clients, suppliers and public officials are recorded via our relevant systems. All accounts, invoices and other documents relating to dealings with third parties, such as clients, suppliers and business contacts,</p>

	<p>should be prepared and maintained with strict accuracy and completeness.</p> <p>Follow due diligence - reasonable efforts should be undertaken and precautions to identify or prevent foreseeable risks should be undertaken by employees and associated persons prior to entering into any contract, arrangement or relationship with a potential supplier of services.</p>
Joint venture and collaborations	<p>Labotek GB could be liable for any bribery or corruption committed by a fellow joint venture party or a contractor which is to Labotek GB's commercial or financial benefit.</p> <p>It is therefore vital that detailed due diligence is carried out on any prospective joint venture or contractor before committing to any such arrangement and on each renewal of such arrangement.</p> <p>It may be necessary, as a result of the due diligence, to require the joint venture party or contractor to 'sign up' to equivalent anti bribery measures.</p>

## **Examples of possible Bribery scenarios:**

*If you encounter any of the following while working for Labotek GB, you must report them promptly to the UK Director and Director.*

- You are offered an unusually lavish gift or hospitality.
- You become aware that a third party engages in, or has been accused of engaging in, improper business practices.
- A third party requests an unexpected additional fee or commission to facilitate a service.
- A third party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provisions of services.
- A third party demands that you provide employment or some other advantage to a friend or relative.
- A third party insists on receiving a commission or fee payment before committing to signing up to a contract
- You receive an invoice from a third party that appears to be non-standard or customised.
- A third party requests payment in cash and/or refuses to sign a formal commission or fee arrangement, or to provide an invoice, or receipt for a payment made.
- A third party requests that payment is made to a country or geographic location different from where the third party resides or conducts business.
- A third party requests that a payment is made to overlook potential legal violations.
- A third party refuses to put terms agreed into writing.
- A third party requests or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used or known to Labotek GB.