

## POLICY STATEMENT

ICS is committed to preventing bribery at all levels. The directors recognise that bribery restricts free and fair competition, damages the company's reputation and can result in criminal prosecutions.

Bribery – 'giving someone a financial and other advantage to encourage that person to perform their functions or activities improperly or to reward that person for having already done so'.

### Risk Areas

- Any client or potential client
- Any supplier or potential supplier
- Any party likely to gain through an act of bribery.

### Company Responsibilities

- Communicate policy to all staff
- To ensure adequate recourses are made available
- Identify bribery risks
- Introduce measures to mitigate risks
- Provide training
- Regular monitoring.

### Employees Responsibilities

- Ensure any invitations to corporate hospitality events are approved by the directors
- Report and offers or promises or actual gifts to the directors
- Report any suspected acts of bribery
- Report and co-operate in any investigations
- Attend training as directed.

All employees are required work to this policy. Any employee who believes that he or she is being offered bribery should raise the issue with a company director.

This policy is issued to all staff.

Leigh Croucher  
Sales Director  
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