

SCC Chartered Accountants

Anti-Bribery Policy & Procedures



Policy Statement

Bribery is a criminal offence. SCC Chartered Accountants Limited ("SCC" / "company" / "we") do not, and will not, pay bribes or offer improper inducements to anyone for any purpose, nor do we or will we, accept bribes or improper inducements.

To use a third party as a conduit to channel bribes to others is a criminal offence. We do not, and will not, engage indirectly in or otherwise encourage bribery.

SCC is committed to applying the highest standards of ethical conduct and integrity in its business activities and to the prevention, deterrence and detection of bribery. We have zero tolerance towards bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate.

We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate, including the Bribery Act 2010.

Objective

This policy provides a coherent and consistent framework to enable SCC's employees to understand and implement arrangements enabling compliance. In conjunction with related policies and key documents it will also enable employees to identify and effectively report a potential breach.

We require that all personnel, including those permanently employed, temporary agency staff and contractors:

- act honestly and with integrity at all times and to safeguard SCC's resources for which they are responsible
- comply with the spirit, as well as the letter, of the laws and regulations of all jurisdictions in which SCC operates, in respect of the lawful and responsible conduct of activities

Scope

This policy applies to all of the company's activities. For partners, joint ventures and suppliers, we will seek to promote the adoption of policies consistent with the principles set out in this policy.

Within SCC, the responsibility to control the risk of bribery occurring resides at all levels of the company. It does not rest solely within assurance functions, but in all business units and corporate functions.

This policy applies to all individuals working at all levels and grades, including directors, senior managers, officers, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, homeworkers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries or their employees, wherever located.

In this policy, third party means any individual or organisation that comes into contact with us, 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.

Bribery and Corruption

Bribery is an inducement or reward offered, promised or provided to gain personal, commercial, regulatory or contractual advantage.

Corruption is the misuse of office or power for private gain.

Unacceptable

We do not (nor do we procure someone) to:

- give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to “facilitate” or expedite a routine procedure;
- accept payment from a third party that we know or suspect is offered with the expectation that it will obtain a business advantage for them;
- accept a gift or hospitality from a third party if we know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return;
- threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
- engage in any activity that might lead to a breach of this policy.

Facilitation and Kickbacks

Facilitation payments are not tolerated and are illegal. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. We do not make, and will not accept, facilitation payments or “kickbacks” of any kind.

Kickbacks are typically payments made in return for a business favour or advantage. We avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.

Gifts and Hospitality

This policy does not prohibit normal and appropriate gifts and hospitality (given and received) to or from third parties unless otherwise specifically stated. However, any gift or hospitality:

- must not be made with the intention of improperly influencing a third party or staff member to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
- must comply with local law in all relevant countries;
- must be given in the name of the organisation, not in an individual's name;
- must not include cash or a cash equivalent;
- must be appropriate in the circumstances;
- must be of an appropriate type and value and given at an appropriate time taking into account the reason for the gift;
- must be given openly, not secretly.

Gifts must not be offered to, or accepted from, government officials or representatives, politicians or political parties, without the prior approval of the Compliance Officer.

We appreciate that the market practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift should always be considered.

Donations

We do not make contributions to political parties. We only make charitable donations that are legal and ethical under local laws and practices.



Staff Responsibilities

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for the organisation or under its control. All staff are required to avoid activity that breaches this policy.

You must:

- ensure that you read, understand and comply with this policy
- raise concerns as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

As well as the possibility of civil and criminal prosecution, staff that breach this policy will face disciplinary action, which could result in dismissal for gross misconduct.

Monitoring and Review

We will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness.

Raising a Concern

SCC is committed to ensuring that all of us have a safe, reliable, and confidential way of reporting any suspicious activity. We want each and every member of staff to know how they can raise concerns.

We all have a responsibility to help detect, prevent and report instances of bribery. There are multiple channels to help you raise concerns. Preferably the disclosure will be made and resolved internally.

Concerns can be anonymous. In the event that an incident of bribery, corruption, or wrongdoing is reported, we will act as soon as possible to evaluate the situation.

Staff who refuse to accept or offer a bribe, or those who raise concerns or report wrongdoing can understandably be worried about the repercussions. We aim to encourage openness and will support anyone who raises a genuine concern in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring nobody suffers detrimental treatment through refusing to take part in bribery or corruption, or because of reporting a concern in good faith.