

Policy Documents

Section 1020

Anti-Corruption Policy

Un-Controlled Document

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1. Introduction

At Case Communications we appreciate the importance of ethical behaviour in our relations with stakeholders and we are proud of our high ethical standards, but we cannot be complacent about the threat of bribery and corruption in our business as, unfortunately, it is a feature of corporate and public life in many countries across the world. Governments, businesses and non-governmental organisations such as Transparency International are working together to tackle the issue but despite our collective efforts eradicating all forms of bribery and corruption will take time.

Our first business principle deals with ‘integrity in corporate conduct’ which commits us to implement anti-corruption policies and procedures.

Our second business principle ‘ensuring openness and transparency’ commits us never to engage in bribery, any form of unethical inducement or payment including facilitation payments and ‘kickbacks’. This policy is part of those commitments.

The UK Bribery Act 2010 and the US Foreign Corrupt Practices Act 1977 create offences and penalties for bribery and corruption. The UK Bribery Act 2010 creates a corporate offence of failure to prevent bribery, and requires Case Communications to implement ‘adequate procedures’ to prevent bribery.

This policy sets out the responsibilities of Case Communications people and Case Communications businesses in preventing bribery and corruption and how we will implement ‘adequate procedures’ to do so. In developing this policy reference has been made to Transparency International’s ‘Business Principles for Countering Bribery’.

2. Definition

For the purposes of this policy, bribery occurs when one person offers, pays, seeks or accepts a payment, gift, favour, or a financial or other advantage from another to influence a business outcome improperly, or to induce or reward improper conduct. Bribery and corruption – whether involving government officials, or commercial entities, including joint ventures – can be direct or indirect through third parties such as agents, brokers and joint venture partners. It includes facilitation payments even though in some countries facilitation payments are legal.

3. Scope

Case Communications has put these procedures in place to prevent bribery by any individual or organisation that performs services for or on behalf of Case Communications. Consequently, this policy applies to every employee, contractor, director and officer in every wholly-owned Case Communications company and in every joint venture company under Case Communications control.

Contractors, consultants or suppliers who are our agents or who are working on our behalf or in our name, through outsourcing of services, processes or any business activity, will be required to act consistently with this policy when acting on our behalf.

Independent contractors, consultants or suppliers will be made aware of this policy, as it applies to our people in their dealings with them. Our responsible procurement and supplier management policy will also continue to apply to suppliers.

Joint venture companies not under Case Communications control and joint venture partners are encouraged by Case Communications to adopt a similar policy, and adequate procedures, to prevent bribery.

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4. Policy

Case Communications does not tolerate **any form** of bribery or corruption. No one who comes under the scope of the policy must offer, to pay, make, seek or accept a personal payment, gift or favour in return for favourable treatment or to gain any business advantage. They must follow the anti-bribery and corruption laws to which they and Case Communications are subject, remembering that UK and US anti-bribery and corruption laws apply wherever they are operating.

They are liable to disciplinary action, dismissal, legal proceedings and possibly imprisonment if they are involved in bribery and corruption.

They must ensure people who work for and with them understand bribery and corruption is unacceptable. They must comply with Case Communications’ procedures for the prevention of bribery and corruption. Employees must declare and keep a record of hospitality or gifts accepted or offered, which will be subject to managerial review.

We do not make direct or indirect contributions to political parties. We will uphold laws relevant to countering bribery and corruption in all the jurisdictions in which we operate, particularly laws that are directly relevant to specific business practices. The following national and international laws and conventions underpin this policy:

- OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (1997)
- OECD Guidelines for Multinational Enterprises – Combating Bribery.
- Foreign Corrupt Practices Act (US)
- UN Global Compact – Principle 10 (Anti-Corruption)
- Extractive Industry Transparency Initiative

5. Adequate procedures

Anti-bribery and corruption is a business priority. Case Communications shall regularly and systematically identify bribery and corruption risks in its business and implement adequate risk-based procedures aimed at preventing bribery and corruption occurring, including:

- **Communication** – We will communicate this policy and relevant guidance to employees across the company, through our established internal communication channels. We will also communicate this policy to our suppliers, contractors and business partners and wider stakeholders.
- **Gifts and Entertainment** – No employee will be allowed to accept any gift or entertainment from any supplier or prospective supplier.
- **Books and records** – We will maintain adequate books and records which properly and fairly document all financial transactions. We will maintain written evidence to record compliance with this policy.
- **Audit** – Our internal control systems will be subject to a regular audit to provide assurance that they are effective in countering bribery and corruption.
- **Travel and Hospitality** – A Case Communications employee maybe required to travel on behalf of the company on business from time to time. At no time will any employee be given free travel or accommodation by a supplier. Certain low levels of hospitality are accepted when in the course of normal business, for example attending seminars or training, and these must be registered with the employee’s line manager and be approved by that manager.

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- **Falsification of Company records**– falsification of company records will be deemed to be a corrupt practice for which appropriate action will be taken.
- **Giving to Charity** – Case Communications believes it has a social responsibility and as such makes regular donations to charities. Where a charity is linked to a potential or actual customer or supplier, no donation may be made if any exchange of business is linked to that donation. All donations to charity must be passed through the board of directors.
- **Bribery** – at no time will any director, employee, contractor or sub-contractor offer any representative of a customer or potential customer any incentive to provide Case Communications with a competitive advantage.
- **Conflicts of Interest** – if any employee suspects a conflict of interests between Case Communications and a supplier or potential supplier they must report this fact to their line manager with immediate effect.
- **Mergers and acquisitions** – Through due diligence we will prevent the acquisition of bribery and corruption related liabilities.
- **Business relationships** – We will ensure that our business partners – including contractors, suppliers, agents, brokers and joint venture partners –are fit to do business with.
- **Supply chain** – We will address bribery and corruption risk in our supply chain, for example by ensuring that payments made for goods and services are reasonable.
- **Conflicts of interest – gifts and hospitality** – We will address conflicts of interest and the risks created by gifts and hospitality through the implementation of our internal policies.

6. Responsibilities

The Managing Director is the Board director with primary accountability for our anti-bribery and corruption efforts and shall report the results of adherence to this policy at least annually to the Case Communications Board of Directors.

Anyone who comes under the scope of the policy must report actual, potential or suspected corruption in Case Communications or by any individual or organisation with whom Case Communications does business. Failure to do so may result in liability for Case Communications and for them personally.

They must report any request for an improper payment, or any indication that a person might be making corrupt payments or that a person has an intention or plan to violate this policy.

They have a similar obligation to report any information or knowledge of any hidden fund or asset, of any false or artificial entry in Case Communication’s books and records, or any payment that circumvents Case Communications internal financial processes.

7. Reports must be made immediately.

If any instance of bribery or corruption is identified, an investigation will take place under the guidance of the Managing Director or his or her nominee.

8. Monitoring and review

The Case Communications Directors is responsible for engaging any third party person or persons independently assess compliance with this policy.

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The Case Communications Directors may also make an independent assessment of the adequacy of the policy in response to an event such as an instance of bribery.

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