

IAN ROUTLEDGE CONSULTANCY LIMITED
BRIBERY AND CORRUPTION POLICY – ISSUE 1.0 3 OCTOBER 2017

1. Introduction

- 1.1. The Ian Routledge Consultancy Ltd (IRC) values its reputation and is committed to maintaining the highest level of ethical standards in the conduct of its business affairs. The actions and conduct of the firm's directors and staff as well as others acting on the firm's behalf are key to maintaining these standards.
- 1.2. The purpose of this document is to set out IRC's policy in relation to bribery and corruption. The policy applies strictly to all directors, employees and subconsultants.

2. Understanding and Recognising Bribery and Corruption

- 2.1. Acts of bribery or corruption are designed to influence an individual in the performance of their duty and incline them to act in a way that a reasonable person would consider to be dishonest in the circumstances.
- 2.2. Bribery can be defined as offering, promising or giving a financial (or other) advantage to another person with the intention of inducing or rewarding that person to act or for having acted in a way which a reasonable person would consider improper in the circumstances. Corruption is any form of abuse of entrusted power for private gain and may include, but is not limited to, bribery.
- 2.3. Bribes are not always a matter of handing over cash. Gifts, hospitality and entertainment can be bribes if they are intended to influence a decision.

3. Penalties

- 3.1. The Bribery Act 2010 comes into force on 1 July 2011. Under that Act, bribery by individuals is punishable by up to ten years' imprisonment and/or an unlimited fine. If IRC is found to have taken part in the bribery or is found to lack adequate procedures to prevent bribery, it too could also face an unlimited fine.
- 3.2. A conviction for a bribery or corruption related offence would have severe reputational and/or financial consequences for the firm.

4. IRC Policy

- 4.1. IRC will not tolerate bribery or corruption in any form and prohibits the offering, giving, solicitation or the acceptance of any bribe or corrupt inducement, whether in cash or in any other form.
- 4.2. This policy is not intended to prohibit the following practices provided they are appropriate, proportionate and are properly recorded:
 - Normal and reasonable hospitality;
 - Fast tracking a process which is available to all on the payment of a fee; and
 - Providing resources to assist a person or body to make a decision more efficiently, provided that it is for this purpose only.
- 4.2.1. It may not always be a simple matter to determine whether a possible course of action is appropriate. If you are in any doubt as to whether a possible act might be in breach of this policy or the law, the matter should be referred to the responsible director.

4.2.2. IRC will investigate thoroughly any actual or suspected breach of this policy, or the spirit of this policy. Staff found to be in breach of this policy may be subject to disciplinary action which may ultimately result in their dismissal.

5. Key Risk Areas

5.1. Bribery can be a risk in many areas of the firm. Below are the key areas you should be aware of in particular:

- Excessive gifts, entertainment and hospitality;
- Facilitation payments;
- Reciprocal agreements;
- Actions by third parties for which the firm may be held responsible; and
- Record keeping to conceal bribes or corrupt practices.

6. Employee Responsibility and How to Raise a Concern

6.1. The prevention, detection and reporting of bribery or corruption is the responsibility of all IRC staff. If you become aware or suspect that an activity or conduct which is proposed or has taken place is a bribe or corrupt, then you have a duty to report this to the responsible director.

6.2. The IRC director responsible for IRC's bribery and corruption policy is Ian Routledge.



Ian Routledge
Responsible Director
03/10/17