

Anti-Bribery Policy

Policy Statement

Precision Colour Printing's policy is to conduct business in an honest and ethical manner and in accordance with the Bribery Act 2010. We take a zero-tolerance approach to bribery and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships.

The purpose of this policy is to:

- a) Set out the responsibilities of the directors and employees in observing and upholding our position on bribery and corruption; and,
- b) Provide information and guidance to employees on how to recognise and deal with bribery and corruption issues.

Under UK law, it is a criminal offence to offer, promise, give, request or accept a bribe. If an individual is found guilty they can be punishable by up to ten years imprisonment and/or a fine. If a company is found to have taken part in the corruption or lacks adequate procedures to prevent bribery, it could receive an unlimited fine, and loss of business, all of which could have severe financial consequences for the business and cause serious damage to our reputation.

To address the bribery and corruption risks for PCP we have issued this policy which is available to all employees. This policy should be read in conjunction with the Gifts and Hospitality Policy and, disclosure (Whistle-blowing) Policy whereby employees, can approach the company with any suspicions of wrongdoing.

In this policy, "third party" means any individual or organisation that we come into contact with during the course of our business dealings, 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.

Scope

This policy applies to directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, or any other person associated with us, wherever located.

What is bribery?

Bribery is where a person offers, promises or gives a financial or other advantage to a third party in any of the following circumstances:

- Intending the advantage to induce someone to perform a relevant function or activity improperly by, for example, awarding a contract that they might not otherwise have awarded.
- Intending the advantage to reward the recipient for the improper performance of such a function or activity.
- Knowing or believing that accepting the advantage would itself constitute the improper performance of a function or activity.
- Bribery may include accepting or offering excessive corporate hospitality.

What is not acceptable?

It is not acceptable for you (or someone on your behalf) to:

- (a) 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;
- (b) 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;
- (c) Accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them;
- (d) Accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return;
- (e) Threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
- (f) Engage in any activity that might lead to a breach of this policy.
- (g) This policy allows reasonable and appropriate hospitality and or entertainment given to, or received from third parties for establishing or maintaining good business relationships, improving or maintaining our image or reputation or marketing.

Donations/Payments

The company does not make contributions to political parties and will only consider making charitable donations that are legal and ethical under UK law. Any donations must be approved by the Managing Director.

Responsibilities

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all employees. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify HR as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. For example, if a customer or potential client offers you something to gain a business advantage with PCP, or indicates to you that a gift or payment is required to secure their business.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We will reserve our right to terminate our contractual relationship with other workers if they breach this policy.

How to raise a concern

Employees are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries, these should be raised with your line manager and/or with HR. Concerns should be reported by following the procedure set out in our Disclosure (Whistle-blowing) Policy.

What to do if you are a victim of bribery or corruption

HR should be informed as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

Protection

Workers who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform HR immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, a copy of which is available on the Human Resources drive and the company's intranet.

Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

Breach of this policy

Any employee who breaches this policy will face disciplinary action, which could result in Dismissal, we may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Who is responsible for the policy?

The Managing Director has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. HR has a primary and day-to-day responsibility for implementing this policy and dealing with any queries on its interpretation. Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it. The Senior Management team will review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness.