



## Anti-Bribery & Corruption Policy

Stowen is committed to implementing and enforcing effective systems to counter bribery. Therefore, it is Stowen's policy to conduct all aspects of its business in an honest and ethical manner at all times.

### **Stowen will not engage in bribery or corruption.**

Adherence to the clear guidelines set out in this policy will ensure that Stowen and its employees comply with anti-bribery and anti-corruption laws and governmental guidance (UK Bribery Act 2010). The policy reflects the Board's wish to embed a culture of best practice in anti-bribery and anti-corruption measures, and enforcement of the policy will reduce the risk that Stowen or any employee will incur any criminal liability or reputational damage. Control Risks' staff are expected to use their judgement not just to avoid malpractice but to promote good practice.

### **Policy**

The aim of this policy is to help Stowen act in accordance with the Bribery Act 2010, maintain the highest possible standards of business practice, and advise individuals of Stowen's 'zero-tolerance' to bribery. This policy applies to all permanent and fixed-term staff employed by the Stowen, and any contractors, consultants or other persons acting under or on behalf of Stowen.

Stowen will not:

- Make contributions of any kind with the purpose of gaining any commercial advantage.
- Provide gifts or hospitality with the intention of persuading anyone to act improperly, or to influence a public official in the performance of their duties.
- Make, or accept, "kickbacks" of any kind.

### **Stowen's Responsibility**

Stowen will:

- Keep appropriate internal records that will show evidence of the business reason for making any payments to third parties.
- Encourage employees to raise concerns about any issue or suspicion of malpractice at the earliest possible stage.
- See that anyone raising a concern about bribery will not suffer any detriment as a result, even if they turn out to be mistaken.

### **Employee Responsibility:**

Employees must not:

- Accept any financial or other reward from any person in return for providing some favor.
- Request a financial or other reward from any person in return for providing some favor.
- Offer any financial or other reward from any person in return for providing some favor.

### **Non-Compliance**

All employees have a role to play in enforcing the policy and are required to deal with any observed or

reported breaches. Should employees feel apprehensive about their own safety in regard to addressing any breach, they should seek senior management support. Failure to comply with this policy may lead to a lack of clarity over job role, learning needs or expected standards of performance, resulting in reduced effectiveness or efficiency, underperformance and putting service delivery at risk

Any member of staff refusing to observe the policy will be liable to disciplinary action in accordance with Stowen's Disciplinary Policy up to and including dismissal.

### **Implementation of the Policy**

Overall responsibility for policy implementation and review rests with Stowen senior management. However, all employees are required to adhere to and support the implementation of the policy. Stowen will inform all existing employees about this policy and their role in the implementation of the policy. They will also give all new employees' notice of the policy on induction to Stowen. This policy will be implemented through the development and maintenance of procedures for appraisals and one-to-one meetings, using template forms, and guidance given to both managers and employees on the process.

  
**Signed:** \_\_\_\_\_

**Position: Managing Director**

**Date: 10/01/2022**