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Complied by: Peter King  
Reviewed by: Alex Mountain

Revision	Date	Change(s)
1	17/01/2022	Document reviewed

## Summary

The Bribery Act 2010 is a framework of five criminal offences:

- Giving, promising, and offering of a bribe;
- Agreeing to receive or accept a bribe;
- Bribing a foreign official;
- Failure of commercial organisations to prevent bribery;
- A senior officer of a commercial organisation consenting to or conniving in an act of bribery.

ACCESSTEC conducts its business in an honest and ethical manner; we take a zero-tolerance approach to bribery and corruption. We are committed to acting professionally, fairly, and with integrity in all our business dealings and relationships wherever we operate and to this end we intend to implement effective systems to counter bribery.

ACCESSTEC will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we conduct our business.

The company will conduct an effective process of due diligence prior to entering into significant business relationships and all our employees, and others acting on behalf of the company, must comply with our Anti-Bribery Policy. Any breach of the policy is likely to constitute a serious matter for the individual concerned and could constitute gross misconduct, for which the offending employee may be dismissed without notice.

## Gifts and hospitality

This policy does not prohibit normal and appropriate gifts or hospitality given to or received 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 to obtain business or a business advantage, or to expedite a procedure;
- 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 of a type and value appropriate to the circumstances, given at an appropriate time taking into account the reason for the gift; and
- must be given openly, not secretly.
- ACCESSTEC appreciates that the practice of giving business gifts varies between countries and what may be normal 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 and employees should not engage in any activity that might lead to a breach of this policy.

## Facilitation payments and 'kickbacks'

ACCESSTEC does not make, and will not accept, facilitation payments or "kickbacks" of any kind, such as small, unofficial payments made to secure or expedite a routine government action by a government official, or payments made in return for a business favour or advantage.

## Charitable donations and sponsorship

ACCESSTEC only makes charitable donations and provides sponsorship that are legal and ethical under local laws and practices and which are in accordance with ACCESSTEC’s internal policies and procedures.

**Record keeping**

ACCESSTEC maintains appropriate financial records and ensures there is an appropriate business reasons for gifts and hospitality.


**Responsibilities and raising concerns**

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

Employees are required to notify ACCESSTEC as soon as possible if it is suspected that a conflict with this policy has, or is likely to occur. If they are offered a bribe, are asked to make one, suspect that this may happen in the future, or believe that they are a victim of another form of unlawful activity their concerns should be reported to one of the Directors.

**Communication and review**

This policy will be communicated to staff during inductions and at staff meetings.  
This policy will be reviewed on a biennial basis.

<b>Complied by:</b>	Alex Mountain - Director	17/01/2022	
<b>Authorised by:</b>	Peter King - Director	17/01/2022	