



Anti-Bribery and Corruption Policy

Document owner: Head of Compliance & Ethics

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Document History

Version	Change(s)
1.0	New issue
2.0	General review, no changes
3.0	Changed all 'Group Risk & Compliance' function responsibilities to 'Group Internal Audit & Risk' function. Changed all 'Group Risk & Compliance Manager' responsibilities to 'Head of Internal Audit & Risk'. Hyperlink to 'Expolink' added.
4.0	Changes to section 12 – inclusion of mandatory training and policy management attestation: Section 4: enhanced definition of Bribery
5.0	General review and content update
6.0	General review and content update
7.0	General review and content update
8.0	General review and content update



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1. Introduction

- 1.1 The British Standards Institution, together with its subsidiaries ("BSI") has developed a Group Compliance Framework consisting of policies, processes, and procedures supported by both management and technical controls appropriate to the risk profile of the organisation.
- 1.2 It is the policy of the BSI to maintain the highest standards of ethical behaviour in all of our business dealings worldwide. BSI is committed to conducting itself fairly, honestly and lawfully in all its business dealings and relationships globally. BSI has a zero-tolerance approach to bribery and corruption.
- 1.3 BSI is bound by the laws of the UK, including the Bribery Act 2010 which governs our conduct both in the UK and worldwide. BSI is a global enterprise and is committed to upholding all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate.

2. Purpose

- 2.1 The purpose of this Policy is to state BSI's global position on bribery and corruption and to provide information and guidance on recognising and dealing with bribery and corruption.

3. Scope

- 3.1 This policy applies to all employees, external resource and temporary resource (including but not limited to consultants, contractors and agency workers) ("Personnel") and any other person or organisation who performs services for, or on behalf of, BSI in any location around the world.
- 3.2 This policy is not part of any contract of employment and does not create contractual rights or obligations. It may be amended by BSI at any time.



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4. Aims

4.1 The aims of this policy are to:

- (a) set the minimum requirements and procedural steps that all personnel must follow in order to comply with this policy. Each jurisdiction may impose additional, more onerous requirements to meet their local obligations but cannot reduce the requirements of this policy.
- (b) provide information and guidance to those working for BSI on how to recognise and deal with bribery and corruption issues.

In this policy, third party means any individual or organisation you come into contact with during the course of your work for BSI, and includes actual and potential clients, suppliers, distributors, business contacts, agents, advisers, government and public bodies, including their advisors, representatives and officials, politicians and political parties.

5. Bribery

- 5.1 A bribe is an inducement, reward or anything of value including any financial or other advantage given, offered, requested, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage, or to improperly influence any act or decision of any person. Corruption is the misuse of entrusted power for private gain.
- 5.2 Acts of bribery or corruption are designed to influence the individual in the performance of their duty and induce them to act in a contrary manner. Inducements can take the form of gifts, fees, rewards, jobs, internships, favours or other advantages such as complimentary concert tickets and/ or inappropriate access to sporting events.

Examples:

Offering a bribe

You offer the representative of a client a weekend away for him and his partner if the client agrees to extend our contract for another three years.

This would be an offence as you are making the offer to influence the client's judgment and impartiality towards its suppliers. It may also be an offence for the client representative to accept your offer.

Receiving a bribe

A supplier offers you a ticket to watch your favourite football team and makes it clear that it could be a regular occurrence if we continue to do business with them.

It would be an offence for you to accept the offer as it would be seen as an attempt to influence your impartiality and good faith towards our suppliers and therefore result in improper performance in your role.



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Bribing a foreign official

You arrange for an additional payment to a foreign official to speed up an administrative process, such as updating official business registration or accreditation documents.

You commit the offence of bribing a foreign public official as soon as the offer is made.

- 5.3 Dependent on the nature of individual circumstances, offences could be attributed to BSI as an organisation, or could be attributed to individual members of staff.
- 5.4 BSI understands that as we operate within numerous jurisdictions across the globe, our employees and business partners will be exposed to different local cultures. We acknowledge that as BSI is bound by the laws of the UK, some rules may contradict local culture, for example the refusal of a gift may be considered impolite in some jurisdictions. If a difficult situation arises, please ensure that you do contact the Compliance & Ethics Team or Group Legal. They will provide appropriate guidance on how to navigate the situation in line with this policy. Despite differences throughout the jurisdictions in which we operate, we should always follow the rules set out within this policy or, should a local jurisdiction have more onerous requirements, the local requirements should be followed in that jurisdiction.

6. Gifts and Hospitality

- 6.1 BSI's Code of Business Ethics states that "BSI Group employees, agents and other representatives are prohibited from giving or receiving money or gifts which could be construed as bribes." This policy does not prohibit reasonable and appropriate hospitality (given or received) to or from third parties. Please ensure that you refer to our separate [Gifts and Hospitality Guidance](#) document for further information.
- 6.2 Occasionally you may give or receive a gift of low monetary value (under £20) from someone who does business with BSI. For example, you may be offered or provide a corporate giveaway, consumables or other items of nominal value. Gifts of a nominal value are not required to be registered via BSI's online [Gifts and Hospitality Register](#).

Once the aggregate value of the gifts received or provided amounts to £60 or more in any twelve-month period to or from a single source, a country, regional manager, or a member of the Group Leadership Team (or their identified delegate) is required to review this and provide guidance on how to proceed.

- 6.3 If any one gift offered or received is valued at £20 or more, this gift should be registered via BSI's online [Gifts and Hospitality Register](#). Where possible, advance approval from an employee's line manager is required prior to accepting or giving the gift. Among the factors to be considered in determining the appropriateness of a gift(s) over £20 will be whether the gift is customary in the



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particular geography or industry concerned and openly given without any expectation or realization of special advantage.

- 6.4 Larger gifts are more likely to cause a conflict of interest. Accordingly, the advance approval of a country, regional manager, or a member of the Group Leadership Team (or their identified delegate) is required in order to give or accept more than £60 (or local equivalent) worth of gifts to or from a single source in any twelve-month period.
- 6.5 All offers of corporate hospitality should be recorded in the Gifts and Hospitality Register regardless of the perceived value, with information duly recorded on rationale to support the decision reached. Corporate hospitality, such as business lunches, dinners, drinks, hospitality at a sports or social event or other meetings in a social context are not considered to be gifts if (1) a significant purpose of the meeting is business-related, and (2) your participation is in the ordinary course of business and is usual and customary. This can be a tricky area, caution should be applied to ensure that practices adopted are reasonable and in line with our requirements. If you are given tickets to a sporting event for your personal use, this would be considered a gift. If you attend an event with clients, business partners or suppliers, it would ordinarily not be considered a gift unless this occurs with a frequency that suggests a business purpose is not valid. If you have any doubts about your participation in such events, they should be discussed with your country or regional manager or a member of the Group Legal or Compliance & Ethics team.
- 6.6 BSI understands that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable 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. For example, there is a difference between accepting a 'corporate gift' (such as a traditional mark of a partnership between companies, which may sit on display in your office) and a 'personal gift' (which you might take home or enjoy personally) that might have the appearance of influencing your objectivity or impartial judgement.

7. What is not acceptable?

7.1 General principles

- (a) It is not permitted for you to offer anything over a nominal value without first getting approval in accordance with the Gifts and Hospitality Guidance.
- (b) It is not permitted for you to accept anything over a nominal without first getting approval in accordance with the Gifts and Hospitality Guidance.



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- 7.2 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 procedure.
 - (c) accept payment from a third party that you know or suspect is offered with the expectation that the third party will obtain a business advantage in return for the payment.
 - (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 employee or person working on behalf of or representing BSI who has refused to commit a bribery offence or who has raised concerns under this policy; or engage in any activity that might lead to a breach of this policy.

8. Facilitation payments and kickbacks

- 8.1 Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. They are not commonly paid in the UK but may be common in some other jurisdictions in which we operate.
- 8.2 Kickbacks are typically payments made in return for a business favour or advantage.
- 8.3 BSI will not make facilitation payments or kickbacks of any kind. You must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by BSI.
- 8.4 If you are asked to make any payment on behalf of BSI, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for an invoice or a receipt which details the reason for the payment. If you have any suspicions, concerns or queries regarding a payment, you should raise these with the Compliance & Ethics Team at compliance@bsigroup.com.

9. Charitable Donations and Sponsorship

- 9.1 BSI only makes charitable donations and provides sponsorship that are legal and ethical under local laws and practices, and which are in accordance with BSI's internal policies and procedures. Please refer to the Group Charitable Donations Policy for specific information relating to making charitable donations or providing sponsorship.



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10. Reporting

- 10.1 The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for BSI or under our control. All personnel are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 10.2 If you believe or suspect that a conflict with this policy has occurred, you must immediately notify Group Legal or the Compliance & Ethics Team, alternatively you may also report the incident anonymously by using the Speak Up service, accessible via the following link:
- <https://www.safecall.co.uk/clients/bsi/>
- 10.3 Personnel who breach this policy will face disciplinary action, which could result in dismissal for gross misconduct.

11. Record Keeping

- 11.1 BSI keeps financial records and has appropriate internal controls in place to evidence the business reasons for making payments to third parties. Accordingly, you must ensure that all expense claims relating to hospitality or gifts incurred by you on behalf of BSI for the benefit of a third party are submitted in accordance with our expenses policy and specifically record the reason for the expenditure.
- 11.2 You must declare all gifts and hospitality (excluding nominally valued items) given or received, and if an aggregate amount of £60 has been reached in one twelve-month period, this will be reviewed by the Compliance & Ethics Team. Gifts and hospitality must be declared using the Gifts and Hospitality Register available on the BSI intranet. Records will be audited and monitored by the Compliance & Ethics Team.

12. How to raise a concern

- 12.1 You are encouraged to raise concerns about any issue or suspicion of corruption at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries, you should raise them with your line manager, Group Legal or the Compliance & Ethics Team at compliance@bsigroup.com. If you feel that you are unable to report using any of these routes or would prefer to remain anonymous, please use the BSI Speak Up service, accessible via the following link:
- <https://www.safecall.co.uk/clients/bsi/>
- 12.2 It is important that you tell your line manager or the Group Legal or the Compliance & Ethics Team 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.



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13. Protection

- 13.1 Personnel for those who are acting on behalf of BSI who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. BSI encourages openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.
- 13.2 BSI is committed to ensure that 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 your line manager, Group Legal or the Compliance & Ethics Team. If the matter is not remedied, and you are an employee, you should raise it formally using your local People Grievance Procedure.

14. Training

- 14.1 Mandatory training on this policy will form part of the induction process for all new employees. All existing employees and contingent workers and temporary resources will receive mandatory annual training and regular, relevant updates on how to implement and adhere to this policy. Committee members will receive training on this policy as part of their induction programme.

15. Responsibility for this Policy

- 15.1 BSI's Board of Directors has approved and issued this policy as part of its overall responsibility for ensuring that BSI complies with its legal and ethical obligations, and that all those under its control comply with this policy.
- 15.2 The Compliance & Ethics Team is responsible for this policy and any queries relating to its contents should be directed to them at compliance@bsigroup.com. Management, at all levels, are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.
- 15.3 It is the responsibility of all personnel to comply with this policy. Our zero-tolerance approach to bribery and corruption must be communicated to all personnel at the outset of our business relationship with them and as appropriate thereafter. All employees and those who are acting for, or on behalf of BSI, have an obligation to notify third parties of this policy at the start of any business relationship.



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16. Exception Process

16.1 Requests for exceptions to this policy must be sent to the Compliance & Ethics team. No exception will be valid until the receipt of written approval of such exception. Failure to comply with this policy may be grounds for disciplinary action, up to and including dismissal.

17. Monitoring and review

17.1 The Compliance & Ethics Team will monitor the effectiveness and review the implementation of this policy regularly and will report to BSI's Board of Directors on its suitability, adequacy and effectiveness. Any improvements identified by the Board of Directors will be made as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

17.2 Employees and those who are acting for, or on behalf of, BSI are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Compliance & Ethics Team.

18. Contact Information

18.1 Questions relating to this policy should be addressed to the Compliance & Ethics Team at compliance@bsigroup.com

19. Associated Documents

Reference Number	Document Name
1	<i>Code of Business Ethics</i>
2	<i>Charitable Donations Policy</i>
3	<i>Gifts and Corporate Hospitality Guidance</i>
4	<i>Third Party Supplier Code of Conduct</i>