



## Anti-Bribery & Modern Slavery Statements

The Anti-Bribery & Modern Slavery Statement is a controlled document and is maintained on the server as read only. The Information Security Officer will ensure that all amendments are circulated, and obsolete copies removed and filed. Hard copies used for training and internal auditing are controlled and distributed as follows.

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Author:	David Hazeldine (HSEQ Smart Ltd) and Ella Grice
Approved By:	Anesh Dayaram
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### Amendment History

This document is reviewed periodically, at least annually, and is retained for a period of 5 years. Amendments and revisions are distributed to the named holders. The history of amendments and the issue of revisions are recorded below.

Date	Amend. No.	Page No.	New Issue No.	Reason for Change	Authorised By
01/12/2023	-	All	1	Initial release.	Anesh Dayaram
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## **Anti-Bribery Policy**

Arum Systems Limited (the 'Company') is committed to implementing and enforcing effective systems to counter bribery. Therefore, it is Company policy to conduct all aspects of its business in an honest and ethical manner at all times.

This policy applies to all individuals working for the Company, including anyone providing services to the Company such as consultants, or contractors.

## **Policy Aim**

The aim of this policy is to help the Company act in accordance with the Bribery Act 2010, maintain the highest possible standards of business practice, and advise individuals of the Company's 'zero-tolerance' to bribery.

## **The Law**

Under UK law (UK Bribery Act 2010), bribery and corruption is punishable for individuals by up to ten years imprisonment. If the Company is found to have taken part in the corruption or lacks adequate procedures to prevent Bribery, it could face an unlimited fine and be excluded from tendering for Government contracts.

## **Policy Statement**

This policy applies to all permanent and fixed-term staff employed by the Company, and any contractors, consultants or other persons acting under or on behalf of the Company.

The Company 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.

The Company will:

- Keep appropriate internal records that will evidence 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 favour.
- Request a financial or other reward from any person in return for providing some favour.
- Offer any financial or other reward from any person in return for providing some favour.

### **Gifts and Hospitality**

This policy does not prohibit giving and receiving promotional gifts of low value, or normal and appropriate hospitality.

Receiving Business gifts:

- Receiving promotional gifts of low value is normal and appropriate, however, gifts may not be accepted without approval. Any gift offered and then refused because of its value, must be reported to The Company.

Offering Business gifts:

- Business gifts are primarily aimed at thanking customers and suppliers for their custom and loyalty, only authorised gifts may be given.

Receiving Hospitality:

The acceptance of corporate hospitality must be transparent; all invitations must be reported to the company before an employee accepts any invitation. The following areas are exempt while attending conferences, seminars, sponsored by third parties.

- business and travel expenses incurred
- normal business lunches and meals

Offering gifts and hospitality:

- Company hospitality is primarily aimed at thanking customers and suppliers for their custom and loyalty. All hospitality events must have approval.

Donations to organisations:

- No donations should be made to charities, political parties or other organisations without approval of the Directors and committee/board.

### **Non-Compliance**

#### **Staff**

Failing to observe Company policy may lead to disciplinary action in accordance with the Company's Disciplinary Policy.

#### **Visitors**

In the event of a breach of the policy by other organisations, or individuals, the Company will take appropriate action.



## Monitoring Policy

The policy will be monitored on an on-going basis to ensure that it addresses issues effectively.

The following will be monitored:

- That all individuals working for the Company are advised of the policy.
- Assessment of any reported incident or related occurrence.

Monitoring of the policy is essential to assess how effective the Company has been to establish control of its obligations.

## Definitions

**Bribe** is a financial or other advantage offered or given to anyone to persuade them to or reward them for performing their duties improperly, or, with the intention of influencing them in the performance of their duties.

**Hospitality** is the practice of being hospitable, this includes the reception and entertainment of guests / visitors.

**Kickbacks** or facilitation payments are typically small payments made in return for a business favour or advantage.

## Modern Slavery Policy

### Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

As a Company we are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers, and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.



## **Scope**

This policy applies to all persons working for or on our behalf of the Company in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

## **Responsibilities**

The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The management teams have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

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 and the issue of modern slavery in supply chains.

## **Compliance**

All applicable interested parties must ensure this policy is read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of the Company or supply chains is the responsibility of all those working for the Company or its control. All parties are required to avoid any activity that might lead to, or suggest, a breach of this policy.

A member of the management team must be notified as soon as possible if it is believed or suspected that a conflict with this policy has occurred or may occur in the future.

If it is believed or suspected a breach of this policy has occurred or that it may occur a manager must be noticed as soon as possible. Where appropriate, and with the welfare and safety of local workers as a priority, the Company may give support and guidance to its suppliers to help them address coercive or exploitative work practices in their own business and supply chains.

If uncertain about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the



various forms of modern slavery, it should be raised with a member of the management team.

The Company aims 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. The Company is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of the business or in any of the supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If it is believed that any such treatment has been suffered, inform the Director of Legal and Compliance immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found at HR/Accounts office.

### **Breaches of this Policy**

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

The Company may terminate our relationship with other individuals and organisations working on its behalf if found to breach this policy.

### **Reviewing of Policies**

These policies will be reviewed on an annual basis and, if necessary, will be revised in the light of legislative or organisational changes. Improvements will be made by learning from experience and the use of an established annual review..

### **Training**

All staff members must complete the full suite of online compliance training provided by the Company.

### **Document Management**

This document is valid as of 01/12/2023.

This document is reviewed periodically and at least annually to ensure compliance with the following prescribed criteria.

- Legislative requirements defined by law, where appropriate

Signed by

*Anesh Dayaram*

Anesh Dayaram  
Information Security Officer