



# ANTI BRIBERY AND GIFTS POLICY

## VERSION: SEPTEMBER 2019



**oneway**  
BUILDING YOUR FUTURE

[www.oneway.co.uk](http://www.oneway.co.uk)

Head Office: Units 6-7 Crosshouse Centre, Cross House Road, Southampton, S014 5GZ Tel: 02380 981605

Northern: Office 2 Connect Business Village, 24 Derby Road, Liverpool, L5 2QE Tel: 0151 909 2279

Greater London: Brook House, 54A Cowley Mill Road, Uxbridge, Middlesex, UB8 2QE Tel: 01895 808160





## Bribery and Gifts Policy

Without exception, One Way and its subsidiary companies strictly prohibit bribery and corruption in any form. One Way commits itself to:-

- Conduct all of its business in an honest and ethical manner.
- Take a zero-tolerance approach to bribery and corruption and
- Act professionally, fairly and with integrity in all of its business dealings and relationships wherever it operates.
- Implement and enforce effective systems to counter bribery.

These are the business values by which One Way expects you to do business on its behalf. One Way explains in more detail below how these principles work out in practice.

### The meaning of Bribery

Bribery is the most common form of corruption. Bribery involves the offering, giving, receiving or soliciting of money, a gift or other financial advantage as an inducement to do something that is improper, illegal or a breach of trust in the course of doing business. This includes any payment through a third party and a recipient acting or failing to act in anticipation of receiving a financial or other advantage.

### Why do One Way adopt this Policy?

As a company One Way believes in following the principles of integrity, transparency and accountability. A key part of corporate integrity is complying with all applicable rules. As a company carrying out their business in the United Kingdom One Way are also directly affected by and are subject to the Bribery Act 2010 (the Act) together with other legislation.

This legislation imposes strict legal rules on One Way's trading with which it must comply. One Way must comply with the Act simply because it carries out business in the UK. One Way can be responsible for acts of bribery committed on its behalf, by anyone acting on its behalf, even without its knowledge, anywhere in the world.

If you abide by the principles and procedures set out in this document both you and One Way will be able to carry on business in the knowledge that you are complying with this Act and the other legal rules which are relevant.

Any violation of this policy by an individual or entity acting on One Way's behalf may result in disciplinary action up to and including termination of employment and termination of the business relationship. In addition you should note that the penalties for violation of the laws against bribery are harsh and include fines and imprisonment for individuals. For One Way penalties can include unlimited fines, debarment from tendering for public sector contracts as well as reputational damage.

### Who must follow the rules?

Anyone who conducts business on behalf of One Way must abide by these rules. This can amongst others include:-

- Employees, officers, directors, principal shareholders
- One Way's subsidiaries and affiliates
- One Way's joint venture partners
- Other third parties who perform services on behalf of One Way. This will include consultants, agents, sub-contractors, distributors, resellers, channel partners and any self-employed workers.

### How do One Way organise and oversee compliance?

The rules set out in this Policy have been adopted and approved by the Board. One Way has appointed a Compliance Officer, who is responsible for the on-going implementation and monitoring of anti-bribery compliance. Please address any questions regarding this Policy to the Compliance Officer in the first instance. Your Compliance Officer is Paul Payne.

### What is expected from you?

One Way expect all those who are obliged to follow these rules to abide by the principles set out below (in addition to stating the principles, One Way also give brief examples of how these may translate into practical actions) which everyone must support on a day-to-day basis. Some of these principles anticipate that One Way as a company will also take steps to ensure that it supports you by having the right policies and



procedures in place. One Way is fully committed to doing that and if at any stage, you have concerns about the procedures or rules One Way publishes you are asked to share those concerns so that they can be addressed.

The principles to which One Way is committed, and which you must support, are:

**One Way will carry out its business fairly honestly and openly.**

**Example:** One Way will have transparent payment terms in all financial transactions it undertakes and keep clear records of what it does.

**One Way will not pay or offer to pay bribes. Nor will One Way condone the offering of bribes on its behalf to any third party, and, in particular, public officials, so as to gain or seek to gain new business or a business advantage.**

**Example:** The ban on bribes extends to giving any gift or financial benefit as well as obvious bribes such as an enlarged commission or secret cash payment if it is intended to induce the recipient to do something improper or illegal. The prohibition covers all bribes

**One Way will not accept bribes nor will it agree to them being accepted on its behalf in order to influence business.**

**Example:** The ban on accepting bribes means that One Way will never condone underhand dealings with any customer or potential customer seeking a “favour” from One Way. Again, the ban which extends to all those acting on its behalf applies to any form of benefit which may be offered, so covers offers of lavish and unwarranted corporate hospitality as well as other forms of possible inducement.

**One Way will avoid doing business with others who do not accept its values and who may harm its reputation.**

**Example:** One Way has processes and procedures in place to ensure that it carries out appropriate checks and due diligence on all of its business partners. It is important for One Way to know who it is doing business with and to be confident of their commitment to take a stand against bribery or corrupt conduct in any form. Bribery, if proven, can taint a business’s reputation but can also cause harm to business partners associated with it.

**One Way will set out processes for avoiding direct or indirect bribery and abiding by and supporting its values.**

**Example:** One Way have established rules for dealing with gifts, corporate hospitality and entertainment, political contributions, charitable contributions and sponsorships and facilitation payments. These are set out below.

**One Way will keep clear and updated records.**

**Example:** Record-keeping extends to ensuring all employees record in the appropriate internal register which One Way maintains details of all gifts and hospitality received. In addition, One Way keeps records of any decisions made on giving donations to third parties or how any demand for a bribe or other benefit from a third party was handled.

Details of any gifts and hospitality and of any donations to third parties must be notified to your Line Manager who will keep a register and make further enquiries as required.

**One Way will make sure everyone in its business and its business partners know about its principles and the rules have been established.**

**Example:** One Way regularly reminds all concerned of the rules that have been laid down. One Way does this by publishing these rules both internally and by making them available on its website.



**One Way will regularly review and update these rules and the procedures, which are relevant to their implementation.**

**Example:** As explained above, the approach One Way adopts to countering all forms of bribery and corruption is organic. One Way welcomes and invites your active participation in raising matters of concern so that it can improve and update its approach to particular issues.

**One Way will abide by its principles even when it becomes difficult.**

**Example:** One Way will not engage in bribery or similar practices (e.g. the making of facilitation payments) even when it would be to its advantage to do so. Similarly if One Way discovers that a business intermediary who represents One Way is behaving corruptly it will not continue with that relationship, but will sever its ties to protect its reputation. One Way seeks to ensure that all new contracts with such third parties incorporate clauses, which give it the right to terminate those contracts in such circumstances.

### **COMPLIANCE IS MANDATORY**

One Way will always ensure that no employee suffers demotion or any penalty or other adverse consequences for refusing to engage in or reporting questionable conduct. This is the case even if such a refusal might result in One Way losing long-term business. One Way must insist on strict compliance with this Policy by all employees and others to whom this Policy applies. One Way will not hesitate to take appropriate disciplinary action (up to and including termination of employment) against any employees who violate this Policy or breach the rules set out above in the interests of protecting its business.

### **Gifts Policy**

One Way is committed to not receiving or giving bribes. Gifts can sometimes be disguised bribes or be misinterpreted as bribes. One Way must ensure that giving or receiving gifts cannot distort its business relationship, create a conflict of interest or be construed as a bribe. A conflict of interest may also arise by the giving or receiving of favours or special treatment to which no financial value can be attached.

Such special treatments generally encourage a “pay-back” expectation and can distort a business relationship.

One Way sets out below the rules which clearly define what it considers to be genuine and acceptable and what is not. A gift should be reasonable and proportionate. It is important to remember that a value of a gift in the UK may have a higher value in other countries and additional care must be taken that the gift is at an appropriate level.

### **Accepting gifts**

- Employees and others working on behalf of One Way are permitted to accept gifts which are below £50 in value. If any gifts are received which are in excess of £50 then authority must be sought from your Line Manager who will decide whether the gift should be accepted taking into account all the relevant circumstances. A record should be kept by the individual employee as to any gifts that are accepted and submitted on a monthly basis to your Line Manager.
- Gifts are not permitted to be accepted that may induce performance of an employee or cause obligation on behalf of that employee, for example, whilst contract negotiations are taking place. In these circumstances, the gift must be returned with a letter explaining the position.
- Employees and others working on behalf of One Way are not permitted to accept frequent gifts from any one person and/or organisation (i.e. in excess of £200 per annum) unless prior authority is obtained from your Line Manager who will take into account all the relevant circumstances. If gifts are received on a regular basis, they should be returned with a letter of explanation or alternatively, the gift may be donated to charity.
- If a gift is presented to an employee with a value in excess of £50 and it is not possible or it is offensive to refuse such a gift (e.g. at a public event) you should consult with your Line Manager and either acceptance of the gift will be permitted taking into account all the relevant circumstances or, alternatively, proper disposal of the gift can be agreed upon. This may involve either, returning the gift with a letter of explanation or donating it to charity.

### **Giving gifts**

- One Way appreciates that in some circumstances gifts can be appropriate. All gifts must be reasonable and proportionate and the gift must be pre-approved by your line manager. Care must be taken to ensure that by offering the gift you are not placing the recipient in a position of obligation. If



the gift is in excess of £50 then this must be pre-approved by your Line Manager who will consider the relevant circumstances before deciding whether the gift should be offered.

### **Gift reporting**

Any gifts given or received, other than branded gifts or stationery, must be recorded by the individual employee and submitted to your Line Manager on a monthly basis.

### **One Way- Corporate Hospitality Policy**

Corporate Hospitality can help build goodwill in a business relationship but it can also make it difficult for One Way to remain objective about the person or company with whom it is dealing as it may create an obligation or conflict of interest.

Corporate hospitality spans a range of activities including, but not limited to, lunches, sporting fixtures, golf days, conferences and theatre tickets.

None of One Way's hospitality policy is intended to prohibit the appropriate exchange of routine business hospitality for the purpose of building and maintaining proper business relationships, however, all offers of hospitality must be reasonable and proportionate.

Everyone must use good judgment, tailored to the specific circumstances, as to whether the offer or acceptance of the hospitality is the right thing to do. Consideration must be given as to whether the offer of the hospitality is being used to influence or could be perceived in this way.

### **Accepting hospitality**

- The acceptance of hospitality by employees or other persons associated within One Way is permitted if the total inclusive value is less than £150. You must obtain permission from your immediate line manager before accepting the offer. This should be fully documented by the individual employee and submitted to your Line Manager on a monthly basis.
- Any hospitality which is offered by others in excess of £150 in value should be politely turned down, unless there is a real business reason why the offer should be accepted. This will be dependant on individual circumstances and should be fully documented to your Line Manager who will consider all the relevant circumstances and will make the final decision.
- Employees and others associated with One Way are not permitted to accept frequent offers of hospitality from any one person and/or organisation (i.e. in excess of £500 per annum) unless there is a real business reason as to why the offer should be accepted. Authority must be sought from your Line Manager who will take into account all the relevant circumstances.

### **Giving or offering hospitality and entertainment**

One Way strictly prohibits attempts to secure business by creating a conflict of interest or obligation on the part of an employee of an organisation doing business with it.

With approval from your immediate line manager appropriate hospitality may be up to the total inclusive value of £150 per person. A record of such hospitality must be kept by the employee and submitted on a monthly basis to your Line Manager.

If you wish to make an offer of hospitality in excess of £150, then a business case must be submitted to your Line Manager. Your Line Manager will consider this request taking into account all the individual circumstances.

Hospitality for individuals should be restricted to a total inclusive value of £500 per annum in total within the UK (and note should be made of the frequency of occasions with the same individual is being entertained). When considering hospitality abroad the real value of the hospitality in that country must be considered and an equivalent financial limit applied.

### **Behaviour during hospitality events**

Any One Way employee attending or hosting a hospitality event on behalf of One Way should conduct themselves in an appropriate manner.

Employees should conduct themselves in accordance with the One Way Alcohol and Drug Policy and not drink to excess.



Employees found to have behaved inappropriately will be subject to Disciplinary.

#### **Public officials in the UK and elsewhere**

Employees must be particularly vigilant not to breach any of these rules dealing with hospitality when dealing with public officials. There are usually strict laws or regulations which prescribe what government officials may accept. It is your duty to make sure they do not act in breach of these rules.

#### **One Way – Political Contributions Policy**

One Way, its employees and agents should not make direct or indirect contributions to political parties, organisations or individuals engaged in politics as a way of obtaining any advantage in business transactions.

Any such contributions may only be made if approved by a One Way Board Director and publicly disclosed.

#### **One Way – Charitable Contributions and Sponsorships Policy**

One Way and all its employees must be vigilant to ensure that any charitable contributions and sponsorships are not used as a means of concealing or disguising bribery.

Any monies paid to a charity require the approval of a One Way Board Director and must not be dependant on the success of, or to win a business deal.

Sponsorship is only permitted where this brings real measurable benefits to One Way and must be approved by a One Way Board Director. Again One Way is committed to ensuring that sponsorships are made for the benefit of the business and are not used as cover for bribery.

#### **Public Statement of Commitment**

One Way recognises that corruption can have a detrimental effect on society by undermining legal systems, damaging social and economical development and free and fair competition.

One Way is committed to carrying on its business in an honest and ethical manner. One Way strictly prohibit bribery and corruption of any form. One Way is committed to conducting its business fairly, honestly and transparently. One Way expect all employees and others working on its behalf to adhere to this commitment. One Way will seek to avoid doing business with other organisations that are not committed to an anti-bribery regime.

One Way takes its legal obligations under the Bribery Act 2010 extremely seriously and has implemented policies and procedures to ensure, as far as it can, that all employees and others acting on its behalf adhere to these anti-bribery principles. It is One Way's intention to ensure that every employee and other persons acting on its behalf behave responsibly so as to maintain compliance with the law and preserve its reputation.

Signed Date: September 2019

Paul Payne, Managing Director