



SMART 5 Consulting Limited

Anti-Bribery Policy

t: +44(0) 20 3686 6135

m: +44(0) 780 944 9726 [Syed]

w: <https://www.smart5.co.uk>

e: syed@smart5.co.uk, info@smart5.co.uk

1. Purpose

The purpose of this Anti-Bribery Policy is to set out Smart 5 Consulting Limited's commitment to preventing bribery and corruption in all its forms. This policy provides guidelines to employees and associated parties on recognizing and dealing with bribery and corruption.

2. Scope

This policy applies to all employees, directors, officers, consultants, contractors, vendors, and any other third parties working with or on behalf of Smart 5 Consulting Limited.

3. Definition of Bribery

Bribery is defined as the offering, giving, receiving, or soliciting of any item of value to influence the actions of an official or other person in discharge of a public or corporate duty. Examples of bribery include:

Offering cash or gifts to secure a business contract.

Providing favors or hospitality to gain an unfair advantage.

Accepting payments or other benefits for preferential treatment.

4. Policy Statement

Smart 5 Consulting Limited has a zero-tolerance approach to bribery and corruption and is committed to:

Conducting all business dealings transparently and ethically.

Complying with all applicable anti-bribery laws and regulations.

Encouraging employees to report any suspected bribery or corruption.

Protecting whistleblowers from retaliation.

Taking immediate and appropriate action against any form of bribery or corruption.

5. Responsibilities

Management:

Promote an anti-bribery culture within the organization.

Implement and maintain effective anti-bribery controls and procedures.

Provide training and resources to employees to ensure compliance with this policy.

Employees:



Act with integrity and avoid any activities that could lead to, or imply, involvement in bribery or corruption.

Report any suspected bribery or corruption through designated channels.

Cooperate with investigations and audits related to bribery and corruption.

6. Prohibited Conduct

Offering, promising, giving, or authorizing anything of value to influence the actions of a public official or private person.

Accepting or soliciting gifts, hospitality, or other benefits that could affect the performance of your duties.

Facilitating payments intended to expedite routine governmental actions.

7. Gifts and Hospitality

Employees must avoid giving or receiving gifts or hospitality that could be perceived as an attempt to influence business decisions. All gifts and hospitality must:

Be of nominal value and infrequent.

Be transparent and properly recorded.

Not create a conflict of interest or an appearance of impropriety.

8. Reporting Bribery

Any employee or associated party who suspects or becomes aware of bribery or corruption must report it immediately. Reports can be made to:

Direct Supervisor

Human Resources Department

Compliance Officer

Designated Whistleblower Hotline

9. Investigation Process

All reports of suspected bribery will be investigated promptly and thoroughly. The investigation process will include:

An initial assessment to determine the validity of the report.

A detailed investigation conducted by the Compliance Officer or an appointed external investigator.

Maintaining confidentiality to the extent possible.

Taking appropriate actions based on the findings of the investigation.

10. Disciplinary Actions

Employees found to have engaged in bribery or corruption will face disciplinary action, up to and including termination of employment, and legal action where applicable. Contractors, vendors, and other parties found to have engaged in bribery may face termination of contracts and legal action.

11. Whistleblower Protection

Smart 5 Consulting Limited is committed to protecting whistleblowers who report bribery or corruption in good faith. Retaliation against whistleblowers will not be tolerated and will result in disciplinary action.

12. Training and Awareness

Regular training sessions will be conducted to ensure that all employees are aware of this Anti-Bribery Policy and understand their role in preventing and detecting bribery and corruption.

13. Review and Monitoring

This policy will be reviewed annually and updated as necessary to ensure its effectiveness. Internal controls and anti-bribery measures will be monitored continuously.

Acknowledgement

I, [Employee Name], have read and understood the Smart 5 Consulting Limited Anti-Bribery Policy. I agree to comply with this policy and understand the consequences of any violation.

Signature: _____

Date: _____

