



SMART 5 Consulting Limited

Anti-Corruption Policy

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Effective Date: 12-06-2024

1. Introduction

SMART 5 CONSULTING LIMITED ("the Company") is committed to conducting business in an ethical and honest manner and is committed to implementing and enforcing systems that ensure bribery is prevented. The Company has zero-tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships, wherever we operate.

2. Purpose

The purpose of this policy is to set out the responsibilities of the Company and those who work for us, in regards to observing and upholding our zero-tolerance position on bribery and corruption. It also provides information and guidance to those working for us on how to recognize and deal with bribery and corruption issues.

3. Scope

This policy applies to all employees, contractors, consultants, temporary workers, volunteers, interns, and agents ("employees") working for or on behalf of the Company, regardless of their location. It also applies to all third-party individuals and entities the Company engages with, including clients, suppliers, and business partners.

4. Definition of Corruption and Bribery

Corruption is the abuse of entrusted power for private gain. It can take many forms that vary in degree from the minor use of influence to institutionalized bribery.

Bribery is the offering, giving, receiving, or soliciting of something of value for the purpose of influencing the action of an official in the discharge of their public or legal duties. Bribes can take many forms, including money, gifts, hospitality, expenses, reciprocal favors, political or charitable contributions, or any direct or indirect benefit or consideration.

5. Policy Statements

- Prohibition on Bribery and Corruption: The Company prohibits the offering, giving, solicitation, or acceptance of any bribe, whether cash or other inducement, to or from any person or company, wherever they are situated, and whether they are a public official or body or private person or



company, by any individual employee, agent, or other person or body acting on behalf of the Company.

- Facilitation Payments: The Company prohibits the use of facilitation payments, which are typically small, unofficial payments made to secure or expedite a routine government action by a government official.

- Gifts and Hospitality: The Company recognizes that offering and accepting gifts and hospitality of moderate value is a customary part of good business relationships. However, they should not be given or received with the intention of influencing business decisions.

6. Responsibilities

- Management: Management at all levels is responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it.

- Employees: Employees are required to avoid any activity that might lead to, or suggest, a breach of this policy. Employees must notify their manager or the designated compliance officer as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future.

7. Reporting and Compliance

- Employees are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. The Company is committed to ensuring 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 offense has taken place, or may take place in the future.

- All reports will be thoroughly investigated in line with the Company's whistleblowing policy and appropriate action will be taken.

8. Training and Communication

- Training on this policy forms part of the induction process for all new employees. All existing employees will receive regular, relevant training on how to adhere to this policy.

- The Company's zero-tolerance approach to bribery and corruption will be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and as appropriate thereafter.

9. Record Keeping

- The Company will keep detailed and accurate financial records and will have appropriate internal controls in place to act as evidence for all payments made. All accounts, invoices, and other records relating to dealings with third parties, including suppliers and clients, should be prepared with strict accuracy and completeness.

10. Monitoring and Review

- The Company will regularly monitor and review procedures designed to prevent bribery and corruption by employees and other individuals or entities under our control. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

11. Sanctions for Breach

- Any breach of this policy by an employee will be grounds for disciplinary action, up to and including termination of employment. Any breach by a third party will be grounds for termination of the relationship and potential legal action.

12. Contact Information

For any questions or concerns regarding this policy, please contact:

SMART 5 CONSULTING LIMITED

Registered Address: 23 Quarles Park Road, Chadwell Heath, Romford, RM6 4DE, UK

Email: [appropriate contact email]

Acknowledgment

I, [Employee Name], acknowledge that I have read and understood the Anti-Corruption Policy of SMART 5 CONSULTING LIMITED, and I agree to comply with it.

Signature: _____

Date: _____

This policy will be reviewed annually and may be amended at any time to ensure its effectiveness.

SMART 5 CONSULTING LIMITED

Registered Office: 23 Quarles Park Road, Chadwell Heath, Romford, RM6 4DE, UK

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