



Anti-Bribery and Corruption Policy

1. Document Information

Title	Anti-Bribery and Corruption Policy
Owner	Gary Willock
Issue Date	31/10/2023
Last Review Date	31/10/2023
Version	1.0
Approved by:	Gary Willock (CTO)

2. Interpretation

Board – Board of Directors for Anson Group Limited.

UK – refers in this policy to the United Kingdom of Great Britain and Northern Ireland as well as to the Crown dependencies

Anson Group Limited engages directly with individuals, groups and Organisations within the UK primarily and occasionally overseas for the purposes of IT Consultancy and IT Delivery Services.

This policy is mandatory and has been endorsed for companywide adoption by the Board and Directors of ANSON GROUP LIMITED on the 31st October 2023

3. The Bribery Act 2010

The UK is a signatory to the UN Convention against Corruption, which requires participating countries to put in place anti-bribery criminal laws. Because of historic problems prosecuting corruption under previous legislation the Government recognized that broad-ranging and flexible powers were required and enacted the Bribery Act. The Bribery Act received Royal Assent in April 2010 and came to force on 1 July 2011. The principal provisions of the Bribery Act include:

- Two general offences covering the offering, promising or giving of a bribe (active bribery) and the requesting, agreeing to receive or accepting of a bribe (passive bribery) (sections 1 and 2);
- A discrete offence of bribing a foreign public official in order to obtain or retain business or an advantage in the conduct of business (section 6);



Anti-Bribery and Corruption Policy

- An offence which can be committed by commercial organisations which fail to prevent bribery committed on their behalf (section 7);

4. Scope and application of this policy

Anson Group Limited recognizes that its services delivery, bid work, and procurement activities involving potentially high value contracts, and make it vulnerable to the risk of bribery and corruption. Anson Group Limited is therefore committed to the **highest level of ethical standards** and **sound governance** arrangements and sets high standards of impartiality, integrity and objectivity in relation to the stewardship and management of all its activities.

Anson Group Limited adopts zero tolerance to bribery and corruption.

The conduct of Anson Group Limited Board, Executive Directors, staff and others directly involved in delivering Anson Group Limited business activities (including retained consultants acting on our behalf) form an essential part of these governance arrangements and ethical standards. General rules relating to conduct and disciplinary action are contained within employment terms and conditions; and specific policies and procedures in place relating to the prevention of bribery and corruption are summarized within this policy.

The principles contained within this policy apply to both internal and external audiences, including anyone wishing to undertake business or engage with Anson Group Limited.

5. Active bribery

Anson Group Limited will not tolerate any internal action which encourages, implies, bestows, tolerates or promises an unfair, unlawful, improper or unethical advantage to any individual, group or organization, regardless of whether there is financial inducement or not.

Key measures designed to eliminate or reduce the likelihood of active bribery include existing financial controls and constraints, transparent reporting and auditing of all expenditure over £500, internal and external auditing procedures, and strict segregation of duties in all expense processes.

6. Passive bribery

Anson Group Limited will not tolerate the acceptance of bribes to induce a favorable investment or decision, property transaction or other business outcome.



Anti-Bribery and Corruption Policy

At all times Anson Group Limited expects its Board and Committee Members, Executive Directors, staff and consultants acting on our behalf to conduct their work ethically and to fully comply with their terms and conditions of employment and Anson Group Limited policies and procedures.

Additional controls include: segregation of decision making, the policy, rules and recording procedures relating to the acceptance of corporate hospitality and gifts; the mandatory declaration of Board Members, Directors, Officers, Shareholders and staff conflicts of interest; the publication, updating and circulation of these policies internally and externally; periodic risk assessment, compliance monitoring and review; and the enforcement of disciplinary and authority reporting procedures where appropriate.

Furthermore, the following are example policy items are in-place in for all employees, directors, officers and Affiliates of Anson Group Limited which help govern and enforce our zero tolerance approach:

- Declaration of conflicts of interest policy (Internal, Affiliates and Suppliers)
- Gifts Policy (Internal – Employees, Consultants, Associates, Executive Officers, etc.)
- Hospitality (Internal)

7. Bribing Officials

Anson Group Limited will not tolerate bribery or any other corrupt practice to produce a favorable outcome. Anson Group Limited financial controls, including the Unified Expenses Policy, state “reasonableness and value for money should be sought at all times”. The bestowal of over-generous hospitality to an official is therefore inappropriate; and “only receipted proven meal expenses will be reimbursed”. Token memorial souvenir gifts in keeping with the nature of the visit may occasionally be offered or exchanged between Organisations and their officials, but must not exceed the value of £20 without the explicit approval of the company’s chief financial officer and CISO.

8. Reporting actual or potential bribery concerns

Anson Group Limited maintains one important external policy in connection with the reporting of actual or potential bribery concerns: the ‘Reporting Concerns’ Policy.

It is important that all staff are able to ‘Report Concerns’ promptly and without fear of reprisal or victimization and are aware of the means to do so. Anson Group Limited’s Reporting Concerns Policy underlines our commitment and support for those that come forward to express their concerns. This Policy explains how we will help to accommodate any needs that may arise in relation to a disclosure of any financial impropriety (including Bribery, Fraud, Conflict of interest, etc.) as far as possible.



Anti-Bribery and Corruption Policy

Individuals, groups or Organisations with evidence or firm suspicion of Anson Group Limited involvement in active or passive bribery should contact the CISO using Anson Group Limited on anson@ansongroup.co.uk or using the main telephony switchboard.

It is important to stress that in addition to prompt reporting, any document, correspondence, e-mail, text or voice message which may be relevant to the concern should be retained and the content discussed with the CISO and company secretary.

9. Reporting outcomes

Anson Group Limited will not hesitate to report or escalate to an appropriate higher authority actual or potential bribery issues.

Where bribery is suspected, this is a potential criminal offence and will be reported to the police. Allegations of bribery will be thoroughly investigated and may result in appropriate disciplinary or police reporting action where substantiated.

End of Policy