

Anti-Bribery and Corruption Policy

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Version control

Version 1 28/08/18 Policy created.

Introduction

Southern Ultrasound values its reputation and is committed to maintaining the highest level of ethical standards in the conduct of its business affairs. The actions and conduct of the Company's staff as well as others acting on the Company's behalf are key to maintaining these standards.

The purpose of this document is to set out the Company's policy in relation to bribery and corruption. The policy applies strictly to all employees, directors, agents, consultants, contractors and to any other people or bodies associated with **Southern Ultrasound**.

Statement

Southern Ultrasound Ltd shall make every effort to ensure that its operations are fair and unbiased.

Bribery is a criminal offence and morally wrong. It exposes staff to the risk of prosecution, fines and imprisonment as well as endangering the Company's reputation.

Southern Ultrasound is committed to maintaining the highest ethical standards and to carrying on its activities fairly, honestly, openly and in compliance with all applicable laws.

Bribery will not be tolerated by **Southern Ultrasound** in any form and all members of staff and Associates (agents, consultants, contractors, service providers and external partner organisations) are required to uphold the highest standards of integrity in their dealings with or on behalf of the Company and to comply with all applicable laws of the UK.

Failure to do so will result in disciplinary and, where appropriate, legal action against the individuals/Company concerned.

Understanding and recognising bribery and corruption

Acts of bribery or corruption are designed to influence an individual in the performance of their duty and incline them to act in a way that a reasonable person would consider to be dishonest.

Bribery can be defined as offering, promising or giving a financial (or other) advantage to another person with the intention of inducing or rewarding that person to act or for having acted in a way which a reasonable person would consider improper in the circumstances. Corruption is any form of abuse of entrusted power for private gain and may include, but is not limited to, bribery.

Bribes are not always a matter of handing over cash. Gifts, hospitality and entertainment can be bribes if they are intended to influence a decision.

Company Liability

Southern Ultrasound could be liable if a senior person in the Company (for example, a Director) commits a bribery offence. This person's activities would then be attributed to the organisation.

We could also be liable where someone who performs services for it – like an employee or agent – pays a bribe specifically to get business, keep business, or gain a business advantage for the Company.

But the Company will have a full defence for this particular offence, and can avoid prosecution, if it can show it has adequate policies & procedures in place to prevent bribery

Under the Bribery Act 2010 (enforced on 1 July 2011), bribery by individuals is punishable by up to ten years' imprisonment and/or an unlimited fine. If the firm is found to have taken part in the bribery or is found to lack adequate procedures to prevent bribery, it too could also face an unlimited fine.

A conviction for a bribery or corruption related offence would have severe reputational and/or financial consequences for Southern Ultrasound Ltd.

The Policy

Southern Ultrasound will not tolerate bribery or corruption in any form.

The Company prohibits the offering, giving, solicitation or the acceptance of any bribe or corrupt inducement, whether in cash or in any other form:

- *to or from* any person or company wherever located, whether a public official or public body, or a private person or company;
- *by* any individual employee, director, agent, consultant, contractor or other person or body acting on the firm's behalf;
- *in order to* gain any commercial, contractual, or regulatory advantage for the firm in any way which is unethical or *to* gain any personal advantage, pecuniary or otherwise, for the individual or *anyone* connected with the individual.

This policy is not intended to prohibit the following practices provided they are appropriate, proportionate and are properly recorded:

- normal hospitality, provided that it complies with the company's guidance on acceptable practice;
- fast tracking a process which is available to all on the payment of a fee; and/or
- providing resources to assist a person or body to make a decision more efficiently, provided that it is for this purpose only.

It may not always be a simple matter to determine whether a possible course of action is appropriate. If you are in any doubt as to whether a possible act might be in breach of this policy or the law, the matter should be referred to Company Management.

Southern Ultrasound will investigate thoroughly any actual or suspected breach of this policy, or the spirit of this policy. Employees found to be in breach of this policy may be subject to disciplinary action which may ultimately result in their dismissal.

Key risk areas

Bribery can occur in many areas of work. Some key areas all staff should be aware of in particular include:

- * ***Excessive gifts, entertainment and hospitality:*** can be used to exert improper influence on decision makers. Gifts, entertainment and hospitality are only acceptable if specifically agreed by Company Management or have a negligible value.
- * ***Reciprocal agreements:*** or any other form of '*quid pro quo*' are never acceptable unless they are legitimate business arrangements which are properly documented and approved by management. Improper payments to obtain new business, retain existing business or secure any improper advantage should never be accepted or made.
- * ***Actions by third parties for which the firm may be held responsible:*** can include a range of people i.e. agents, contractors and consultants, acting on the firm's behalf. Appropriate due diligence should be undertaken before a third party is engaged, and such engagement can only be made by Company Director(s). Third parties should only be engaged where there is a clear business rationale for doing so, with an appropriate contract. Any payments to third parties should be properly authorised and recorded.
- * ***Record keeping:*** can be exploited to conceal bribes or corrupt practices. We shall ensure that we have robust controls in place so that our records are accurate and transparent.

Measures to prevent bribery

Proportionality:

We shall take action proportionate to the risks we face and to the size of the Company. We recognise that our risks are lower as a result of being an SME and the fact that we do not operate in an overseas market where bribery is known to be commonplace.

Top Level Commitment:

Those at the top of a Company are in the best position to ensure the Company conducts business without bribery. The Company Directors will not tolerate Bribery and hereby advise all staff and those who do business with us or on our behalf that we will not tolerate bribery

Risk Assessment & Due Diligence:

As part of our normal business activities, a Director will assess the risk of bribery in new and current ventures, and take appropriate actions to minimise our risks. This will include making an assessment of the trustworthiness of organisations and businesses to whom we contract

Communication:

We shall communicate our policies and procedures to staff and stakeholders, including publication of this policy on our website, to ensure there is no ambiguity in our commitment against bribery. As part of our normal learning-needs assessment for staff, we shall consider the requirement for additional training related to Bribery and Fraud protection

Monitoring and Review:

We shall monitor and review our approach to Anti-bribery and the related policies annually, and any time there is a change in legislation or perceived risk

Employee responsibility and how to raise a concern

The prevention, detection and reporting of bribery or corruption is the responsibility of all employees throughout the firm. If you become aware or suspect that an activity or conduct which is proposed or has taken place is a bribe or corrupt, then you have a duty to report this. Any such incidents should be reported to Southern Ultrasound' senior Management.

Legislation & Related Policies

- The Bribery Act 2010
- Southern Ultrasound Fees and Charges policy
- Southern Ultrasound Counter Fraud policy
- Southern Ultrasound Whistle-Blowing policy

Distribution & Awareness Plan

All staff will be made aware of the policy as part of their induction training. Any significant changes to the plan that affect the way in which staff respond, will be communicated to them.

A copy of the policy is available to all staff via the Policy and Procedure folder, of our online Quality assurance system and can be accessed 24/7 from any location with Web Access. A hard copy version is retained at all sites of operation and published on the company website.

Training Requirements

Training requirements as a result of this policy are assessed by the Board of Directors and implemented accordingly. Staff training and awareness of this and associated policies is undertaken at induction and discussed as part of clinical appraisals.

Equality Impact Assessment

An Equality Impact Assessment has been performed on this policy and procedure. The EIA demonstrates the policy is robust; there is no potential for discrimination or adverse impact. All opportunities to promote equality have been taken.

		Yes/No	Comments
1.	Does the policy/guidance affect one group less or more favourably than another on the basis of:		
	▪ Race	No	
	▪ Ethnic origins (inc. gypsies and travellers)	No	
	▪ Nationality	No	
	▪ Gender	No	
	▪ Culture	No	
	▪ Religion or belief	No	
	▪ Sexual orientation including lesbian, gay and bisexual people	No	
	▪ Age	No	
	▪ Disability - learning disabilities, physical disability, sensory impairment and mental health problems	No	
2.	Is there any evidence that some groups are affected differently?	No	
3.	If you have identified potential discrimination, are any exceptions valid, legal and/or justifiable?	NA	
4.	Is the impact of the policy/guidance likely to be negative?	NA	
5.	If so can the impact be avoided?	NA	
6.	What alternatives are there to achieving the policy/guidance without the impact?	NA	
7.	Can we reduce the impact by taking different action?	NA	

Policy Approval & Review

This policy has been approved by the undersigned and will be reviewed annually and any time there is a change in legislation or recommendations

Policy Created: 24/08/18
Kevin Rendell Director & IG Lead

Date of Last Review: v1 14/03/19

