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## Documentation Extract

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### **21 Anti-Bribery and Corruption Policy**

#### **21.1 Introduction**

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## 21.5.3 Gifts and hospitality

These can range from small gifts (such as diaries) to expensive hospitality (tickets for major events, holidays etc...), however being in receipt or giving any of these items does not automatically result in an "Act of Bribery". Hospitality or promotional expenditure which is proportionate and reasonable to demonstrating goods or services or reflecting your good relations is unlikely to qualify as a bribe, however extravagant gifts and hospitality may be used to disguise bribes that are intended to induce improper behaviour (eg to fix the outcome of a tendering process). If you are ever in any doubt please discuss all gifts / hospitality with the Senior Management Team before accepting / giving.

## 21.6 Responsibilities

The Kibble Group entrusts all individuals across the organisation to take a proactive role in improving the organisation's anti-bribery policy and practice.

### 21.6.1 Senior Management Team

The senior management team will provide leadership, resources and active support for the implementation of this policy. They are responsible for ensuring that this policy and any associated policies are fit for purpose and complied with.

### 21.6.2 Human Resources

Human Resources is responsible for ensuring that the spirit of this policy is incorporated into all aspects of the organisations people management including recruitment, promotion, training, performance evaluation, remuneration and reward – and that these policies are continually improved in consultation with staff.

### 21.6.3 Finance

Finance is responsible for ensuring that the spirit of this policy is incorporated into all aspects of the organisations financial management including corporate accounting, gifts, staff expenses and donations – and that these policies are continually improved in consultation with staff.

### 21.6.4 Managers

Managers are responsible for holding their direct reports and associated partners / vendors to account. They are responsible for ensuring that their department's risks are assessed and managed in line with this policy.

### 21.6.5 Individuals

Individuals are responsible for not giving or receiving bribes and challenging instances where bribery may occur. They are also responsible for reporting all bribery that they are aware of via the procedures laid polic.

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## 21.7.2 Risk assessment

The Kibble Group risk assesses the organisation in consultation with staff and reviews the risks presented by bribery as part of this.

The Kibble Group recognises that the threat of bribery varies across countries, areas of work, partners and transactions and that our organisation must respond proportionately to those risks. Therefore projects which involve working with partners or overseas are individually assessed, in addition to the ongoing organisational risk assessment.

## 21.8 Due diligence

### 21.8.1 Recruitment

The Kibble Group recognises that good anti-bribery practice starts from the outset of employing an individual. It therefore:

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## 21.9 Communication

All staff and suppliers must understand and comply with The Kibble Group's anti-bribery policy. To ensure that this is communicated, The Kibble Group:

- publishes this policy on the staff intranet
- revises and publishes its code of conduct to explicitly forbid the giving or receiving of bribes
- briefs all staff on The Kibble Group's anti-bribery policy, as part of the organisation's induction as a minimum

## 21.10 Procedures

### 21.10.1 What staff should do if they are offered or asked for a bribe

Individuals should reject demands for or offers of bribes and The Kibble Group's anti-bribery stance should be made clear.

The only circumstance where payment might not necessarily be avoided is when health and security is seriously at risk. Managers should plan their operations and have security procedures to reduce the risk of payments being requested under duress.

### 21.10.2 Where bribery is suspected or where it occurs

To enable proper investigation, staff should record the details of any bribery or requested or attempted bribery, as soon as possible after the event. Any instances of actual or potential bribery should be properly and promptly investigated by a director under the Whistleblowing Policy.

The objectives of an investigation should be to:

- confirm whether or not a bribe has taken place, and to identify who was responsible
- confirm whether internal controls and anti-bribery procedures have worked in practice
- identify any improvements required to anti-bribery procedures

Depending on the findings of the investigation, subsequent action will be determined. This may involve, but is not restricted to, disciplinary action against staff involved or external reporting to:

- a senior official or director of another organisation, if the person making the bribe is from that organisation
- local police/ law enforcement agencies (if deemed appropriate)
- Serious Fraud Office (in the UK SFO has primary responsibility for the UK Bribery Act)
- relevant government department where the bribe took place
- the Charity Commission, if the matter is considered a "serious incident"
- transparency International UK

See the HR Disciplinary and Whistleblowing Policies for further information.

## 21.11 Monitoring and review

This policy will be reviewed as part of The Kibble Group's internal document review process or after a significant change in operations or a significant incident, whichever is sooner.