Version Number: 1.0

Publish Date: 08/03/2023

## UTAX (UK) Ltd Policy Statement Anti-Bribery

Owner: Lucy Brown

Author: Lucy Brown

# UTAX (UK) Ltd Anti-Bribery

## **Policy Statement**

UTAX (UK) Ltd (the "Company") is committed to absolute integrity and fairness across all our operations and accordingly will not tolerate any activities involving bribery or corruption.

Anyone employed or engaged by the Company, those acting on its behalf, and those with which it has any commercial dealings, are obligated to take responsibility for preventing, detecting, and reporting anything that amounts, or could amount, to bribery or corruption.

### The Company commits to:

- Setting out a clear anti-bribery policy & procedure, and making all employees aware of their responsibilities to adhere strictly to this policy at all times
- Setting out the Company's commitment to anti-bribery to those acting on its behalf and entities with which it has any commercial dealings
- Training all employees so that they can recognise and avoid the use of bribery by themselves and others
- Encouraging its employees to be vigilant and to report any suspicions of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately
- Rigorously investigating instances of alleged bribery or corruption, and assisting police and other appropriate authorities in any resultant prosecution
- Taking firm and vigorous action against any individual(s) involved in bribery or corruption

The Company acknowledges responsibility to the Bribery Act 2010 and will ensure transparency within the Company and any commercial activities in which the Company is involved.

#### **Breaches**

All persons are encouraged to raise concerns about any issue or suspicion of bribery or corruption in any parts of the company or its business associates, via the contact details below. The Company will never penalise anyone who refuses to become involved in bribery or corruption or who reports their concerns to us in good faith.

Any employee suspected of breaching this policy will be investigated and may be subject to disciplinary action which could result in dismissal for misconduct or gross misconduct. Relationships with other individuals and companies acting on the Company's behalf or with which it has commercial dealings will be terminated if they breach this policy statement.

Suspicions of a breach in criminal activity relating to a breach in bribery legislation will be reported to the applicable UK governing body or authority.

#### Monitorina

This policy will be reviewed regularly to ensure accuracy and effectiveness.

#### Contact details

Name: Lucy Brown, Head of HR, Facilities & Legal Compliance

Tel: 01793 786002

Email: <u>lucy.brown@utax.co.uk</u>

