

Anti-Bribery & Corruption Policy & Procedure

AGS One and AGS Recruitment (referred to hereafter as AGS) are committed to the prevention of bribery, and shall aim to undertake our business fairly with honesty and transparency. This must be reflected in every aspect of our business affairs.

The action and conduct of AGS Directors and employees (collectively AGS personnel) as well as others acting on AGS' behalf is essential to maintaining these standards. To that end, all AGS personnel, including agents, consultants and contractors as well as suppliers involved in AGS, business must read, become familiar and comply with this Policy & Procedure.

We shall formally assess the risk of bribery within our organization, and other associated persons acting on our behalf, which shall be reviewed at least annually.

Compliance with Anti-Bribery Laws

It is AGS' Policy to comply with all laws, rules, and regulations governing anti-bribery and corruption law, in all areas where we operate. AGS has a zero-tolerance approach to acts of bribery and corruption, by employees or anyone acting on our behalf. Any breach of this policy will be regarded as a serious matter by the Company and may result in disciplinary action.

Under UK law (UK Bribery Act 2010), bribery and corruption is punishable for individuals by up to ten years imprisonment. If the Company is found to have taken part in the corruption or lacks adequate procedures to prevent bribery, it could face an unlimited fine and face untold damage to its reputation.

The payment or offer to pay bribes, or provisions of, or offer to provide gifts or anything of value for improper purposes, to obtain or retain business or any other benefit, (whether for AGS or any other party) is prohibited. Such payments or gifts are also forbidden under the terms of this policy and may result in immediate dismissal for those involved in their payment or receipt.

AGS is required to keep financial records and to have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

Application of the Policy & Procedure

Our policy and procedure shall be communication to all personnel and 'agents' as part of the Company induction process, and following any significant changes.

Adherence to the policy and procedures shall be monitored and review at least annually, and particularly if conditions change.

Where our risk assessment process identifies a high risk of bribery within our organisation, we shall document additional procedures to provide clear, practical and accessible anti-bribery processes proportionate to the risks identified.

This policy and procedure apply to individual employees, agents, sponsors, intermediaries, consultants or any other people or bodies associated with AGS and its employees. Bribery is committed when an inducement or reward is provided, in order to gain any commercial, contractual, regulatory or personal advantage for AGS or another party.

All necessary levels of due diligence shall be undertaken within our organisations, and against all relevant suppliers, subcontractors and agents to identify any corrupt practices.

No bribes of any sort may be paid or accepted from customers, suppliers, politicians, government advisors, representative's private person or Company, employees or workers. It is not permitted to establish accounts or internal budgets for the purpose of making facilitation bribes or influencing transactions (slush funds).

AGS recognises that to refuse a gift in certain circumstances would cause offence to our trading partners.

The test to be applied in all circumstances is whether the gift or entertainment is reasonable and justifiable.

What is the intention of the gift? Is the gift being offered for something in return (quid pro quo).

This Policy does not prohibit the following practices providing they are customary in a particular market, or are appropriate and properly recorded. (Please refer to our code of conduct on gifts and entertainment policy for further information).

- Normal and appropriate hospitality (given or received). The giving of ceremonial gifts on a festival or at another special time, up to and not exceeding the value of 100GBP or 100 Euros.

Employee Responsibility

The presentation, detection and reporting of bribery is the responsibility of all employees throughout the Company.

Suitable channels of communication, by which employees or others can report confidentially any suspicion of bribery, will be maintained through AGS' Whistle Blowing Policy (see information below).

Reporting incidents of Bribery and Corruption.

If you become aware that an activity or conduct which has taken place which you suspect is a bribe (or corrupt) you have a duty to report this. Any such incidents should be reported to your manager or, you to the following Whistle Blowing contacts.

Whistle Blowing - Who to Contact

For further information please call your immediate manager or head office.

For further clarification, please contact:

Dawn James on Tel: 01273 690059 or Email: dawn@agsone.co.uk

Signed: 
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Managing Director

27 July 2023

Name: _____ Position: _____

I have read and understood the AGS policy in respect of bribery and corruption. By signing this form I understand that non-compliance with this policy could result in disciplinary action being taken against me.

Individual's signature: _____ Date: _____