



BRIBERY ACT POLICY STATEMENT

Doxbond Anti-Corruption Policy is being updated to be inline with the formal introduction of the Bribery Act 2010.

It is the policy of Doxbond (The Company) to conduct its business in accordance with the highest ethical standards and in full compliance with UK laws. The Company does not seek to gain any advantage through the improper use of inducements and strictly prohibits its employees from providing, attempting to provide, or offering to provide funds or other assets in the form of bribes, kickbacks, or other payoffs, to any actual or prospective commercial suppliers, customers or individuals with whom we may have business dealings.

Doxbond employees may not under any circumstances solicit, accept or attempt to accept, directly or indirectly from a third party, a bribe, kickback, or other payoff in connection with a transaction contemplated or entered into by the Company.

All Doxbond employees are responsible for understanding this Policy and ensuring its uniform and effective implementation, as well as ensuring that their conduct and actions fully comply with its requirements.

The Company takes its responsibility very seriously. Therefore, the person ultimately responsible for the enforcement of this policy is Mr Dave Allan

Having conducted a risk assessment of the Company's operation, it has been determined that; based on the fact that the Company solely operates in the UK and is a SME, there is "**MINIMAL**" risk of bribery actions occurring. However, to avoid any confusion, the Company is documenting actions that would be considered unacceptable:

Prohibitions

1. No Doxbond Employee may corruptly offer, promise, give, or authorise anyone to offer, promise or give **anything of value** to a current or potential customer in order to obtain an improper advantage in connection with obtaining or retaining business.
2. No Doxbond Employee may make any payment, promise; offer to pay, or to authorise the offer or gift of anything of value to anyone while knowing it is likely to be shared with a current/potential customer for a corrupt purpose.
3. These prohibitions are not limited to cash payments, and include, without limitation, corrupt:
 - 3.1 In-kind contributions;
 - 3.2 Business, employment or investment opportunities;
 - 3.3 Personal discounts or credits;
 - 3.4 Assistance to or support of personally motivated benefits;
 - 3.5 Gifts or Hospitalities; and
 - 3.6 Other benefits, both tangible and intangible.
4. The prohibitions described above apply in **all** situations, and all dealings with current/potential customers must be conducted in compliance with this Policy.



To ensure there are no confusions as to what would constitute a bribe, the Company has also introduced the below policy, which directly relates to our Anti-Bribery position.

GIFTS FROM CLIENTS/SUPPLIERS POLICY

The Company's aim is always to ensure customer and client satisfaction. Occasionally, satisfied customers, clients or other third parties may seek to reward Doxbond employees with gifts. Whilst the Company has no desire to stop deserving employees receiving a small token of gratitude from a satisfied customer or client, there is the potential for abuse. In addition, certain suppliers or contractors may offer "reward schemes" which allow employees to obtain free gifts or discount vouchers in return for ordering services on behalf of the Company from a supplier or contractor. The Company needs to be sure its suppliers and contractors are competitive and that its employees are acting in the best interests of the Company when using a particular supplier or contractor.

The Company does not believe that it is appropriate for employees to accept anything of greater value than small tokens of appreciation from customers, clients, suppliers, contractors or from any other person or organisation with which the Company has, or might have, business connections. This is because it is important to ensure that no employee acts in any way that is inconsistent with the integrity of the business by accepting a gift in circumstances where it could influence, or be seen to influence, that employee's business decisions or actions.

For these purposes a "gift" is any payment or item given to an employee on an apparently ex-gratia basis by any party in connection with the employee's employment by the Company.

Disclosure requirements

The Company also promotes a culture of honesty and transparency in the practice of receiving gifts. If you receive a gift, you must report this to your line manager as soon as it is given to you. You must also provide details of the nature of the gift and the identity of the sender. If you fail to do so, this constitutes a disciplinary offence and will be dealt with in accordance with the Company's disciplinary procedure. Depending on the gravity of the offence, this may be treated as gross misconduct in accordance with the Company's disciplinary procedure and could render the employee liable to summary dismissal.

If the gift is anything other than a small token of appreciation having no substantial financial value, you will be required to return the gift to the sender with a polite letter thanking them and explaining that it is the Company's policy that employees should not receive gifts.

If, in the opinion of your line manager, the gift might constitute a bribe or other inducement, you will be asked to pass the gift to a Director of the Company or Manager who will return it to the sender with a suitable letter explaining the Company's policy and asking the sender to comply with the policy in future.

In cases where your manager determines that the gift constitutes a small token of appreciation for you as a personal reward, you may, at your manager's discretion, be permitted to retain the gift. However, unless the sender of the gift specifically states or makes clear that the gift is intended for you as a personal reward, all gifts are deemed to be the property of the Company and may be



shared amongst members of staff, as appropriate.

Thus, small gifts that are genuinely given as a token of appreciation are acceptable, provided always that you properly declare them in line with this Policy and provided you do not subsequently treat the sender of the gift more favourably than other clients, customers, suppliers or contractors.

If the Company discovers that a supplier has been used by an employee wholly or mainly because of the incentive of a free gift (and, as such, the employee has not acted in the best interests of the Company), this will also constitute a disciplinary offence and will be dealt with under the Company's disciplinary procedure. Depending on the seriousness of the offence, it may again be treated as gross misconduct and could render the employee liable to summary dismissal.

The receipt of all gifts will be closely monitored by the Company.

This Policy does not apply to promotional gifts, i.e. items such as pens, calendars or stationery that bear the company name or logo of another organisation, provided that these have no significant financial value.

These two interlinked Policies will be reviewed on an annual basis; at which time, the Company will re-evaluate the risk assessment results used to develop the Company's approach.

Dave Allan
Doxbond.