

## **Bribery Act 2010: Anti-Bribery Policy**

The Bribery Act 2010 contains two general offences covering the offering, promising or giving of a bribe (active bribery) and the requesting, agreeing to receive or accepting of a bribe (passive bribery). It also sets out two further offences which specifically address commercial bribery: the offence relating to bribery of a foreign public official in order to obtain or retain business or an advantage in the conduct of business, and a new form of corporate liability for failing to prevent bribery on behalf of a commercial organisation. Holmes Wood takes proportionate action to reduce the risk of bribery.

### **1. Top Level Commitment**

The Directors are committed to ensuring that our business is conducted without bribery and will not tolerate active, passive, or any other form of bribery by any employee in carrying out activities on behalf of the Business. Holmes Wood has appointed the Wayfinding Director to be responsible for overseeing the anti-bribery policy and actions.

### **2. Risk Assessment**

Holmes Wood has proportionate procedures in place to reduce the risk of bribery through existing controls over company expenditure, accounting and commercial contracts.

### **3. Due Diligence**

Due diligence will be undertaken on persons who will perform services for Holmes Wood. Holmes Wood will make enquiries with business contacts before others are engaged to represent them in business dealings.

### **4. Communication**

Holmes Wood's Anti-Bribery Policy will be communicated to all employees and to those who perform services for their business. Members of staff with purchasing authority will be given additional information regarding anti-bribery measures that are proportionate to their seniority, level of purchasing authority, and role within the organisation.

### **5. Hospitality**

Genuine hospitality or similar business expenditure that is reasonable and proportionate is acceptable. Invitations and/or acceptances to attend events or other hospitality, may be extended or accepted as a reflection of good relations, provided such activity is demonstrably reasonable and proportionate to support the activities of the company.

### **6. Monitoring and Review**

The Directors will review the anti-bribery policy at regular intervals to ensure the risks faced and the effectiveness of the anti-bribery policy and procedures keep pace with any changes in the bribery risks faced by the organisation.

