



Principle
Networks

Anti-Bribery and Corruption Policy

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Introduction

The purpose of this policy is to provide employees and individuals acting on behalf of Principle Networks, with important information regarding its zero-tolerance position towards bribery and corruption. The policy includes details of the responsibilities under the Bribery Act 2010, as well as guidance on recognising a problem and the process for reporting concerns.

The aim of this policy is to maintain the highest standards of ethical conduct and integrity in our business activities.

This policy will be reviewed regularly. Principle Networks reserves the right to amend or add to this policy, as necessary. A policy cannot contain examples of every instance where it may apply. Employees should consider the contents of the policy, apply its principles, and speak to a Director if unsure. This policy should be read in conjunction with the Employee Handbook.

Definition

A bribe is a financial advantage or other reward that is offered to, given to, or received by an individual or company (whether directly or indirectly) to induce or influence that individual or company to perform an action which is illegal, unethical, a breach of trust or the improper performance of a contract. It is important to recognise that a bribe can be anything of value, and therefore is not only related to the payment of money, for example it could include offering entertainment, gifts, travel, job offers and advantages for family or friends.

Corruption is the misuse of entrusted power for personal gain.

Legislation

It is a criminal offence to give, promise or offer a bribe, agree to receive a bribe, or accept a bribe in the UK or abroad, and the penalties for a breach of the Bribery Act 2010 are significant.

The maximum penalty for an individual is ten years imprisonment, with an unlimited fine. If Principle Networks is found to have failed to prevent bribery in relation to its business, it could face unlimited fines and substantial reputational damage.

Responsibilities

The success of this policy depends on all employees, and those acting for Principle Networks, playing their part in helping to identify bribery and corruption.

Every employee and individual acting on behalf of Principle Networks is responsible for maintaining its reputation and for conducting company business honestly and professionally. It is strictly prohibited to make, solicit, or receive any bribes or unauthorised payments. All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Principle Networks will not conduct business with an individual, customer or third-party that does not support our anti-bribery objectives.

Reporting Concerns

You should notify a director as soon as possible if you are offered a bribe, you are asked to make a bribe, you suspect that this may happen in the future, or you believe you are a victim of another form of unlawful activity. You can report this under our Whistleblowing policy which can be found in the Employee Handbook. Principle Networks will support any individuals who make such a report, provided it is made in good faith.

Breaches

Employees should be aware that failure to comply with this policy may lead to disciplinary action, including termination of employment, and/or criminal prosecution.

Principle Networks reserves the right to terminate our contractual arrangements with any individual, customer or third parties acting for, or on behalf of, an organisation with immediate effect where there is evidence that they have committed acts of bribery.

Hospitality

This policy does not prohibit normal and appropriate gifts and hospitality (given and received) to or from a customer or third-party, unless otherwise specifically stated. However, any gift or hospitality must:

- not be done in return for a favour
- be given in the name of the organisation, not in the name of an individual or employee
- not include cash or a cash equivalent
- be appropriate in the circumstances
- be of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift
- be given openly, not secretly

Examples of gifts that would normally be considered acceptable are occasional meals with a business contact, occasional attendance at ordinary sports, theatre and other cultural events or networking opportunities, and gifts of nominal value such as small branded items.

Donations

Principle Networks accepts and encourages the act of donating to charities, whether through services, knowledge, time, or direct financial contributions (cash or otherwise), and agrees to disclose all charitable contributions it makes.

Employees must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery. Principle Networks only makes charitable donations and provides sponsorship that are legal and ethical under local laws and practices, and that are authorised by a Director.

Further Information

If any parts of this policy document are unclear, please speak to your manager. Further information can be found in the Principle Networks Employee Handbook, and the following websites provide information and guidance which may be useful.

Government Bribery Act 2010 Legislation

<http://www.legislation.gov.uk/ukpga/2010/23/contents?view=plain>

Document Control, Detail and Change

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Any suggested changes or amendments must be communicated through the author for consideration and inclusion if suitable.

Document Validity and Reference Documentation

This document will be reviewed when changes are made or as part of the annual Principle Networks internal audit process. Any reference documentation and appendices listed within this document will also be reviewed and updated where necessary.

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