

Anti-Corruption Policy

Purpose

This anti-corruption policy exists to set out the responsibilities of **Displaced Consulting Ltd (dPc)** and those who work with us in regards to observing and upholding our zero-tolerance position on bribery, fraud and corruption (collectively referred to hereafter as ‘corruption’).

It also exists to act as a source of information and guidance for those working for **(dPc)**. It helps them recognise and deal with corruption issues, as well as understand their responsibilities.

Definition

Corruption is defined as ‘the abuse of entrusted power for gain’. It includes practices such as bribery, fraud, extortion, collusion and money laundering. It also includes an offer or receipt of any gift, loan, fee, reward, or other advantage to or from any person as an inducement to do something that is dishonest, illegal, or a breach of trust in the conduct of the organization’s activities. This may include cash or in-kind benefits, such as free goods, gifts, and holidays, or special personal services provided for the purpose of an improper advantage or that may result in moral pressure to receive such an advantage. Occasional minor gifts and entertainment should be handled in accordance with the applicable **Conflicts of Interest Policy** and/or other related policies.

Policy statement

dPc is committed to conducting business in an ethical and honest manner, and is committed to implementing and enforcing systems that ensure corruption is prevented. dPc has zero-tolerance for all corrupt activities. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships, wherever in the world we operate.

dPc will constantly uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which we operate. We are bound by the laws of the UK, including the Bribery Act 2010, in regards to our conduct both at home and abroad.

dPc recognises that bribery and corruption are punishable by up to ten years of imprisonment and a fine. If our company is discovered to have taken part in corrupt activities, we may be subjected to an unlimited fine, be excluded from tendering for public contracts, and face serious damage to our reputation. It is with this in mind that we commit to preventing bribery and corruption in our business, and take our legal responsibilities seriously.

Scope

This anti-corruption policy applies to all employees (whether temporary, fixed-term, or permanent), consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, agents, sponsors, or any other person or persons

associated with us (including third parties), or any of our subsidiaries or their employees, no matter where they are located (within or outside of the UK). The policy also applies to Officers, Trustees, Board, and/or Committee members at any level.

In the context of this policy, third-party refers to any individual or organisation our company meets and works with. It refers to actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies – this includes their advisors, representatives and officials, politicians, and public parties.

Any arrangements our company makes with a third party is subject to clear contractual terms, including specific provisions that require the third party to comply with minimum standards and procedures relating to anti-corruption.

What is and what is NOT acceptable

This section of the policy refers to 4 areas:

- Gifts and hospitality.
- Facilitation payments.
- Political contributions.
- Charitable contributions.

Gifts and hospitality

dPc accepts normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts meet the following requirements:

- a. It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits.
- b. It is not made with the suggestion that a return favour is expected.
- c. It is in compliance with local law.
- d. It is given in the name of the company, not in an individual's name.
- e. It does not include cash or a cash equivalent (e.g. a voucher or gift certificate).
- f. It is appropriate for the circumstances (e.g. giving small gifts around Christmas or as a small thank you to a company for helping with a large project upon completion).
- g. It is of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift.
- h. It is given/received openly, not secretly.
- i. It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.
- j. It is not above an excessive value (which is here understood to be in excess of £100).
- k. It is not offer to, or accepted from, a government official or representative or politician or political party, without the prior approval of the company's compliance manager.

Where it is inappropriate to decline the offer of a gift (i.e. when meeting with an individual of a certain religion/culture who may take offence), the gift may be accepted so long as it is declared to the Director (and donor where appropriate), who will assess the circumstances.

dPc recognises that the practice of giving and receiving business gifts varies between countries, regions, cultures, and religions, so definitions of what is acceptable and not acceptable will inevitably differ for each.

As good practice, gifts given and received should always be disclosed to the Director. Gifts from suppliers should always be disclosed.

The intention behind a gift being given/received should always be considered. If there is any uncertainty, the advice of the compliance manager should be sought.

Facilitation Payments and Kickbacks

dPc does not accept and will not make any form of facilitation payments of any nature. We recognise that facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action. We recognise that they tend to be made by low level officials with the intention of securing or speeding up the performance of a certain duty or action.

dPC does not allow kickbacks to be made or accepted. We recognise that kickbacks are typically made in exchange for a business favour or advantage.

dPc recognises that, despite our strict policy on facilitation payments and kickbacks, employees may face a situation where avoiding a facilitation payment or kickback may put their/their family's personal security at risk. Under these circumstances, the following steps must be taken:

- a. Keep any amount to the minimum.
- b. Ask for a receipt, detailing the amount and reason for the payment.
- c. Create a record concerning the payment.
- d. Report this incident to the line manager, Director and/or donor as appropriate.

Political Contributions

dPc will not make donations, whether in cash, kind, or by any other means, to support any political parties or candidates. We recognise this may be perceived as an attempt to gain an improper business advantage.

Charitable Contributions

dPc accepts (and indeed 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 or wider corruption.

dPc will ensure that all charitable donations made are legal and ethical under local laws and practices, and that donations are not offered/made without the approval of the Director.

Responsibilities of employees and associates

As an employee/associate of dPc, you must ensure that you read, understand, and comply with the information contained within this policy, and with any training or other anti-bribery and corruption information you are given.

All employees and associates are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this anti-bribery policy.

If employees or associates have reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, you must notify the Director (or donor/client if appropriate).

If any employee breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct. dPc has the right to terminate a contractual relationship with an employee or associate if they breach this anti-corruption policy.

How to raise a concern

If you suspect that there is an instance of bribery or corrupt activities occurring in relation to dPc, you are encouraged to raise your concerns at as early a stage as possible. If you're uncertain about whether a certain action or behaviour can be considered as corruption, you should speak to your line manager, the Director of dPc, or the donor/client (as appropriate).

dPc will familiarise all employees with its whistleblowing procedures so employees can vocalise their concerns swiftly and confidentially.

If an employee or associate is a victim of bribery or other types of corruption, s/he must tell the Director of dPc as soon as possible. This includes if an employee or associate is offered a bribe by anyone, is asked to make one, suspects that s/he may be bribed or asked to make a bribe in the near future, or has reason to believe that they are a victim of another corrupt activity.

Protection

If you refuse to accept or offer a bribe or you report a concern relating to potential act(s) of bribery or corruption, dPc understands that you may feel worried about potential repercussions. dPc will support anyone who raises concerns in good faith under this policy, even if investigation finds that they were mistaken.

dPc will ensure that no one suffers any detrimental treatment as a result of refusing to accept or offer a bribe or other corrupt activities or because they reported a concern relating to potential act(s) of bribery or corruption.

Detrimental treatment refers to dismissal, disciplinary action, treats, or unfavourable treatment in relation to the concern the individual raised.

If employee or associate has reason to believe they have been subjected to unjust treatment as a result of a concern or refusal to accept a bribe, they should inform the Director of dPc, their line manager or the donor/client (as appropriate) without delay.

Training and communication

dPc will provide guidance on this policy as part of the induction process for all new employees. Employees will be asked annually or in each new/renewed contract to formally accept that they will comply with this policy.

dPc's anti-corruption policy and zero-tolerance attitude will be clearly communicated to all suppliers, contractors, business partners, and any third-parties at the outset of business relations, and as appropriate thereafter.

dPc will provide relevant anti-corruption training and guidance to employees etc. where we feel their knowledge of how to comply with the Bribery Act needs to be enhanced.

Record keeping

dPc keeps and will continue to keep detailed and accurate financial records, and has appropriate internal controls in place to act as evidence for all payments made. We will declare and keep a written record of the amount and reason for hospitality or gifts accepted and given, and understand that gifts and acts of hospitality are subject to managerial review.

Monitoring and reviewing

dPc's Director is responsible for monitoring the effectiveness of this policy and will review the implementation of it on a regular basis. This will assess its suitability, adequacy, and effectiveness.

Internal control systems and procedures designed to prevent corruption are subject to regular audits to ensure that they are effective in practice.

Any need for improvements will be applied as soon as possible. Employees and associates are encouraged to offer their feedback on this policy if they have any suggestions for how it may be improved. Feedback of this nature should be addressed to the Director.

This policy does not form part of an employee's contract of employment and dPc may amend it at any time so to improve its effectiveness at combatting all types of corruption.

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