

# Bribery and Corruption Policy Statement



Grapevine Telecom (Bath) Ltd has a policy of zero tolerance towards bribery and corruption within its client base, employees and business in general, it is considered an act of gross misconduct for any employee to offer, ask for or receive an inducement that may be a reward for an act which may be considered improper. The company management team will (during the period of tender or quotation) assess the risk of inducements being sought or received by its employees, sub-contractors and clients, and if required; control measures will be implemented to ensure integrity is maintained throughout the supply chain. It is also the policy of the company to maintain a confidential open door policy for any employee, who may believe an offence of this nature, has taken place; the senior manager named below should be the point of contact in any such case.

It is wholly unacceptable under this company policy to;

- Give; promise to give, or offer a payment, gift or hospitality with the expectation or hope that an illegal or unfair business advantage will be received, or to reward an illegal or unfair business advantage already given.
- Give, promise to give, or offer a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure.
- Accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them.
- Accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that an illegal or unfair business advantage will be provided by the company in return.
- Retaliate against or threaten a person who has refused to commit a bribery offence or who has raised concerns under this policy.
- Engage in activity in breach of this policy.

It is a requirement of this policy that all employees are briefed on its content on the commencement of their employment and that this policy in its entirety is adhered to throughout the life cycle of their employment.

23<sup>rd</sup> March 2023

A handwritten signature in black ink, appearing to read "J. Spinks".

James Spinks  
Managing Director  
Grapevine Telecom (Bath) Ltd