

Bribery Prevention Procedures

Introduction

1. This policy defines standards and guidelines in relation to adherence to the anti-bribery measures and standards that should apply to the acceptance and provision of gifts and hospitality.
2. It is designed to comply with the Bribery Act 2010.

Responsibility

1. Overall and final responsibility for bribery prevention in Quick Circuits is that of the Managing Director.
2. All employees have the responsibility to co-operate with the Director to achieve bribery prevention across Quick Circuits.
3. Whenever an employee has a concern about potential incidents of bribery they should inform the Director as soon as practicable.

Anti-bribery Policy

1. Quick Circuits recognises that any involvement in bribery is illegal.
2. Quick Circuits values its reputation for ethical behaviour and financial probity and reliability.
3. Quick Circuits prohibits the offering, giving, soliciting or the acceptance of any bribe in whatever form to or from any person or company, public or private by any council member, member of staff, contractor, consultant, agent, overseas agent and any non-employee service provider engaged in Quick Circuits business for whatever reason.
4. The prevention, detection and reporting of bribery is the responsibility of all staff.

Dealing with Contractors, Agents and Business Partners

1. The Bribery Act 2010 highlights a specific type of bribery that could lead to prosecution of Quick Circuits. This is: "The liability to prosecution if a person associated with it bribes another person... where an associated person is one who performs services on or behalf of the organisation".
2. This means that Quick Circuits needs to take care to ensure that any contractors, agents or business partners acting on its behalf comply with the Act.
3. It is essential that contractors and agents acting on Quick Circuits' behalf are made aware of this company's anti-bribery policy and due diligence will be carried out to ensure that external service providers are not acting in a way that would compromise Quick Circuits.

QUICK CIRCUITS LTD

• 1 Loverock Road • Reading • Berkshire • England • RG30 1DZ
• Email: sales@quick-circuits.com • Website: www.quick-circuits.com
• Tel: +44 (0) 118 9508921 • Fax: +44 (0) 118 9568327
• Registration No. 1203058 • Vat No. GB200 5582 08
© Quick Circuits 2017



Giving Gifts and Hospitality

1. Staff may not, directly or through others, offer or give any, money, gift, hospitality or other thing of value to an official, employee or representative any supplier, customer or any other organisation if doing so could reasonably give the appearance of including the organisations relationship with Quick Circuits.
2. Staff may give gifts and hospitality in the following instances:
 - a) Give gifts of a nominal value (such as advertising novelties)
 - b) With management approval, provide meals and other entertainment at venues outside Quick Circuits, provided that the expenses are kept at a reasonable level. For the avoidance of doubt, the per capita cost of a meal should not exceed £50 and would normally be much less.

Receiving Gifts and Hospitality

1. An employee or any member of their family should not, directly or through others, solicit or accept money, gifts, hospitality or anything else that could influence or reasonably give the appearance of influencing the relationship with that organisation or individual.
2. Gifts or hospitality may not be accepted, irrespective of value, which might influence or be seen to influence such situations as the award of business or the use of Quick Circuit's Intellectual Property or other assets, or to benefit personally or for the benefit of any person connected to that person.
3. Unless you have been informed, staff may accept the following:
 - a) A gift of nominal value, such as an advertising novelty, when it is customarily offered to others having a similar relationship with that individual or organisation.
 - b) Customary meals or entertainment provided that the expenses are kept at a reasonable level.
4. For the avoidance of doubt, contact the Director for confirmation of authorisation or prohibition on the following:
 - a) Gifts with a value of more than £25 and hospitality expected to cost in excess of £50.
 - b) Gifts or hospitality in excess of £100.
 - c) Hospitality or gifts in excess of £500
5. If an excessive gift or hospitality is found to have been accepted, then the Managing Director will discuss the circumstances with you and agree how to deal with it. For example, a gift can be returned or steps can be taken to ensure that the acceptance of hospitality does not influence a decision or situation in favour of the giver.
6. If excessive gifts or hospitality are accepted on more than one occasion or are found to have influenced decisions inappropriately, against Quick Circuits' policy (or potentially illegal), then appropriate disciplinary procedures will follow.

QUICK CIRCUITS LTD

• 1 Loverock Road • Reading • Berkshire • England • RG30 1DZ
• Email: sales@quick-circuits.com • Website: www.quick-circuits.com
• Tel: +44 (0) 118 9508921 • Fax: +44 (0) 118 9568327
• Registration No. 1203058 • Vat No. GB200 5582 08
© Quick Circuits 2017



Compliance

1. All staff members are required to comply with The Bribery Act 2010.
2. A conflict of interest occurs when you advance a personal interest (or that of others with whom you are connected) at the expense of Quick Circuits.

Reporting Bribery, Corruption and Non-Compliance with this policy

1. If you know of, or have good reason to suspect that, an unlawful or unethical situation or that you suspect that either an act of bribery or non-compliance to this policy has occurred; you should report the matter to the Director.



Mick Prater
Director

Download Copy

QUICK CIRCUITS LTD

• 1 Loverock Road • Reading • Berkshire • England • RG30 1DZ
• Email: sales@quick-circuits.com • Website: www.quick-circuits.com
• Tel: +44 (0) 118 9508921 • Fax: +44 (0) 118 9568327
• Registration No. 1203058 • Vat No. GB200 5582 08
© Quick Circuits 2017

