

# Six Degrees

## Anti-Bribery and Corruption



## Contents

1. Introduction .....	3
1.1. Purpose .....	3
1.2. Scope .....	3
2. What is bribery? .....	3
2.1. Examples:.....	4
2.1.1. Offering a bribe.....	4
2.1.2. Receiving a bribe.....	4
2.1.3. Bribing a foreign official .....	4
3. Document Control .....	5
3.1. Latest change .....	5
3.2. Non-Disclosure Statement .....	5



## 1. Introduction

It is the Company's policy to conduct all our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.

We uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. When operating abroad, we must abide by both local laws and the laws of the UK, including the Bribery Act 2010.

### 1.1. Purpose

The purpose of this policy is to:

- set out our responsibilities, and of those working for us, in observing and upholding our position on bribery and corruption; and
- provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues.

Bribery and corruption are punishable for individuals by up to ten years' imprisonment and if we are found to have taken part in corruption, we could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation. We therefore take our legal responsibilities very seriously.

### 1.2. Scope

This policy applies to all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, homeworkers, casual workers, agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as workers in this policy).

This policy also applies to all your dealings with third parties. Third party means any individual or organisation you encounter during the course of your work for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

## 2. What is bribery?

A bribe is an inducement or reward offered, promised, or provided in order to gain any commercial, contractual, regulatory or personal advantage.

The offering, promising, or giving of a bribe (active bribery) and the requesting, agreeing to receive, or accepting of a bribe (passive bribery) are offences.



## 2.1. Examples:

### 2.1.1. Offering a bribe

You offer a potential client, tickets to a major sporting event, but only if they agree to do business with us.

This would be an offence as you are making the offer to gain a commercial and contractual advantage. We may also be found to have committed an offence because the offer has been made to obtain business for us. It may also be an offence for the potential client to accept your offer.

### 2.1.2. Receiving a bribe

A supplier gives your nephew a job but makes it clear that in return they expect you to use your influence in our organisation to ensure we continue to do business with them.

It is an offence for a supplier to make such an offer. It would be an offence for you to accept the offer as you would be doing so to gain a personal advantage.

### 2.1.3. Bribing a foreign official

You arrange for the business to pay an additional payment to a foreign official to speed up an administrative process, such as making a tender award in our favour.

The offence of bribing a foreign public official has been committed as soon as the offer is made. This is because it is made to gain a business advantage for us. We may also be found to have committed an offence.



### 3. Document Control

Area	Information
Document Title	6DG Anti-Bribery and Corruption Policy
Author	People Team
Owner	People Team
Date Approved	27/06/2024
Approved by	Compliance Manager
Summary	Company's policy to conduct all our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption.
Classification	Public
Associated records	IMS Portal

#### 3.1. Latest change

Date	Changes Made	Author	Approved
27/06/2024	Date review to align SharePoint with documentation	Compliance Team	27/06/2024
25/04/2024	Reviewed no change	Senior Business Partner	25/10/2024

This is a CONTROLLED document. It is UNCONTROLLED when printed. You should verify that you have the most current issue.

#### 3.2. Non-Disclosure Statement

This document contains intellectual property rights and copyright, which are proprietary to Six Degrees. The work and the information it contains are submitted for making a proposal, fulfilling a contract or as marketing collateral. It is to be treated as confidential and shall not be used for any other purpose. It shall not be copied or disclosed to third parties, in whole or in part, without the prior written consent of Six Degrees.