ANTI BRIBERY POLICY

Definition
Bribery is the acceptance of gifts, money, or other favours in return for providing something of value to the bribe.

Policy Statement
AB2K is dedicated to conducting business consistent with the highest standards of business ethics. We have an obligation to our employees, customers, suppliers and others with whom we interact to be honest, fair and forthright in all business activities. AB2K will not offer or accept gifts, hospitality or other inducements which encourage or reward a decision nor engage in any form of Bribery. We will therefore not tolerate any form of bribery by an employee, person or company associated with AB2K. The purpose of this policy is to set out the rules that must be followed in AB2K to ensure that bribery does not occur.

Unacceptable behaviour
The following behaviour is unacceptable, and is not tolerated in AB2K:

1) Accepting any financial or other reward from any person in return for providing a favour
2) Requesting a financial or other reward from any person in return for providing a favour
3) Offering any financial or other reward from any person in return for providing a favour

Business gifts
In general, business gifts are neither given nor received by AB2K. If on an occasion gifts are given or received they will be reasonable and proportionate. Any gifts given or received will be recorded and assessed by the Managing Director to ensure they are appropriate.
Employees and operatives shall inform their manager of any gifts, however small, that they have received from or been offered by any company or person associated with AB2K. This information shall be recorded in the employee's personal file after a decision was made by the Managing Director as to its appropriateness.

Donations to organisations
AB2K occasionally makes donations to charity and these are managed by the Managing Director. No employee representing AB2K shall make any donation to a charity without the approval of the Managing Director. Under no circumstances shall any person associated with AB2K make any donations to charities, political parties or other organisation with the intention of gaining a business advantage.

Raising concerns
Any employee or contractor who is concerned that acts of bribery are occurring in AB2K or feels he or she has potentially been bribed has a duty to inform their manager. If this course of action is inappropriate, the employee should inform another senior manager or the Managing Director.

Disciplinary action
Any AB2K employee or contractor who is found to be in breach of these policy rules will face disciplinary action which could include dismissal for gross misconduct and may involve the police. A breach could include:

a) Accepting a bribe of any kind
b) Requesting a bribe of any kind
c) Offering a bribe of any kind
d) Not reporting the acceptance or giving of a gift within the company to a manager.

John Murphy,
Managing Director

Date: 30th May 2022
Date of Next Review: 30th May 2023