

# **Kraven Enterprises Ltd**

## **Business Principles and Ethics**

### **Business Conduct Policy**

#### **General Statement**

Kraven Enterprises Ltd is a responsible employer and take it's duties under the Enterprise Act 2004 and Bribery Act 2010 seriously. We are committed to encouraging a safe, professional and enjoyable working environment for all its employees. We believe this engenders the delivery of a highly professional service within the company and encourages a workplace where all employees are treated with dignity and respect.

#### **Principles**

All employees should treat any company property with care.

The highest professional standards are expected of all our employees. Employees will be expected to carry out their work duties with integrity and professionalism and to observe all Company standards. Conduct should at all times be consistent with and maintain and promote the image and reputation of Kraven Enterprises Ltd.

Whilst these principles apply to all employees there is a higher requirement for all employees who hold managerial positions to implement, maintain, and promote the companies policies and procedures.

Any financial interests, business or personal relationships, which appear to, or may compromise the Company's independence, are not permitted.

All employees must follow the company standards to ensure consistency and quality of work.

Gifts from clients or suppliers (except nominal items such as calendars etc) should not be accepted without permission from the Managing Director.

All employees should act diligently and honestly within their duties at all times. If an employees witnesses or suspects a colleague of acting in a way that is illegal, unprofessional or contrary to policy or the best interests of the company they should report this to their Line Manager immediately.

In the course of their work duties all employees should dress appropriately and professionally.

All employees must act consistently with all company policies and procedures.

The company requires the highest standards of personal conduct and will not tolerate any behaviour which is deemed in breach of our policies of contrary to the wider principles of our expectations regarding conduct.

All employees are required to comply with all aspects of the Bribery Act 2010 specifically they must not offer, promise or give reward to another party in order to induce them to perform a relevant function or act improperly. They should not accept such an offer, promise or reward themselves. The company also has a wider responsibility to prevent bribery occurring. The company's position and policy with regard to bribery, and to the measures taken to ensure that bribery does not occur, and is not condoned within Kraven Enterprises Ltd, are set out in the detailed Anti-Bribery Policy Statement below.

## **Anti-Bribery Policy and Procedure**

### **General**

- Bribery is a criminal offence.
- We do not, and will not, pay bribes or offer improper inducements to anyone for any purpose, nor do we, or will we accept bribes or improper inducements.
- To use a third party as a conduit to channel bribes to others is a criminal offence.
- We do not, and will not, engage indirectly in or otherwise encourage bribery.
- We are committed to the prevention, deterrence and detection of bribery.
- We have a zero-tolerance towards bribery.

### **Definition of Bribery**

Bribery is an inducement or reward offered, promised or provided to gain personal, commercial, regulatory or contractual advantage.

It is unacceptable to:

- Give, promise to give, or offer a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given.
- 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 a business advantage will be provided by us 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.

### **Objective of this Policy**

This policy provides a clear and consistent framework to enable Kraven Enterprises Ltd employees to understand and implement arrangements enabling compliance. It will also enable employees to identify and report a potential breach.

Kraven Enterprises Ltd requires all employees to:

- Act honestly and with integrity at all times and to safeguard the company's resources for which they are responsible.

- Comply with this policy and in respect of the lawful and responsible conduct of activities.

### **Scope of this Policy**

This policy applies to all of Kraven Enterprises Ltd activities. It is the responsibility of all employees to minimise the risk of bribery occurring.

### **Kraven Enterprises Ltd commitment to action**

Kraven Enterprises Ltd commits to:

- Setting out a clear anti-bribery policy and keeping it up to date.
- Making all employees aware of their responsibilities to adhere strictly to this policy at all times.
- Briefing all employees so that they can recognise and avoid the use of bribery by themselves and others.
- Encourage its employees to be vigilant and to report any suspicions of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately.
- Rigorously investigate instances of alleged bribery and assisting in any action.
- Taking firm and vigorous action against any individual(s) involved in bribery.
- Provide information to all employees to report breaches and suspected breaches of this policy.

### **Employee Responsibilities**

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for Kraven Enterprises Ltd. All employees are required to avoid activity that breaches this policy.

You must:

- Ensure that you read, understand and comply with this policy.
- Raise concerns as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may in the future.
- Any employee who breaches this policy will face disciplinary action, which could result in summary dismissal for gross misconduct, in addition to the possibility of civil and criminal prosecution.

### **Raising a concern**

Kraven Enterprises Ltd is committed to ensuring that all of us have a safe, reliable and confidential way of reporting any suspicious activity. We want to make sure that all employees know how to raise concerns.

We have a responsibility to help detect, prevent and report instance of bribery. If you have a concern regarding a suspected instance of bribery or corruption you will need to speak to the

Managing Director. We aim to encourage openness and will support anyone who raises a genuine concern in good faith under this policy.

We are committed to ensuring nobody suffers detrimental treatment through refusing to take part in bribery or corruption, or because of reporting a concern in good faith.

The management team will review this policy on an annual basis to ensure of its effectiveness and that it continues to reflect the aims and objectives of the company

If you require any further information or have any questions about this policy please contact your Line manager.

**Kraven Enterprises Ltd**