

OUR COMMITMENT

This policy statement forms part of the company overall management systems

MGL Training Services expects the highest standards of behaviour and conduct of its employees, agents, partners, subcontractors, suppliers and all other third parties acting or purporting to act on its behalf. This policy extends to all employees at all levels in the company.

Responsibilities: The responsibility for implementing and determining company policies is derived by the Board of Directors. Mark Davison has been appointed as having overall responsibility for this policy.

Definition:

Bribery is the accepting of gifts, money, hospitality or other favours in return for providing something of value to the briber. It is company policy to conduct business with honesty and integrity, and without the use of corrupt practices or acts of bribery to obtain an unfair advantage.

Therefore the company will not:

- Offer, promise or pay bribes to anyone.
- Request, agree to accept, or receive bribes.

Unacceptable Behaviour:

There will be zero tolerance of any incidence of bribery. Any employee either offering or receiving a bribe will be deemed to have committed an act of gross misconduct, and will be liable to summary dismissal.

Gifts:

All gifts received, however small must be reported to the appropriate Line Manager and recorded on the Gifts and Hospitality Record. No gift with a nominal value of more than £30.00 may be accepted.

Hospitality:

All invitations must be reported to the appropriate Line Manager. Permission must be granted prior to any acceptance of such invitations.

Offering Gifts and Hospitality:

It is company custom to offer small Supply Chain gifts (e.g. pens, mugs) to customers, suppliers and other persons. If a gift is authorised, the employee is then permitted to give to the appropriate individuals. All gifts are to be recorded on the Gifts and Hospitality Record.

The company occasionally runs hospitality events, primarily aimed at thanking customers and suppliers for their custom and loyalty. Employees are not permitted to organise any additional hospitality events without seeking prior approval.

Donations:

The company makes regular donations to various charities. Employees are permitted to make further donations without prior permission from the Finance Director; however, no donations are to be made to charities that are directly linked to the obtaining of business or a business advantage.

Facilitation Payments:

Facilitation payments are bribes and must not be paid.

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Raising Concerns:

If an employee is concerned that acts of bribery are occurring or they are concerned that they are potentially being bribed they must inform the appropriate Line Manager in the first instance. If this course of action is inappropriate they are to inform another Senior Manager.

Financial Controls:

The company has appropriate controls and reporting mechanisms in place to detect bribery and corruption.

Supply Chain:

Any reported incidence of bribery will be treated with the utmost seriousness and, if proven may lead to expulsion from the Supply Chain.

Expenses:

Senior Line Managers must authorise all expense claims from employees. They have a responsibility and are expected to check and sign all claims forms against receipts. Any items of expenditure that give rise for concern must be fully investigated.

Responsibilities:

Directors are responsible for:

- Promoting and enforcing this Policy to ensure that there is no place for bribery or corruption in MGL Training Services activities. For the avoidance of doubt, this Policy applies to giving and receiving, upstream and downstream.
- Keeping a record of all gifts and hospitality invitations that are offered and / or received.

- The Group Finance Director will maintain the Gifts and Hospitality Register and will make this available for inspection as required.

All employees have a responsibility for the prevention, detection and reporting of bribery and corruption.

Suitable channels of communication by which employees or others can report confidentially any suspicion of bribery and corruption are established in the Confidential Reporting Policy contained within the Employee Handbook.

Communication of Policy. This policy is communicated to all employees and is made available to any interested party.

Policy Review. This policy statement will be reviewed on an annual basis and amended where appropriate.

Gary Smith
Director



June 2017