

## Anti Bribery & Corruption Policy

---

### 1.0 Introduction

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

This policy applies to all proAV employees whether they are temporary, fixed-term, or permanent. In addition, consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, agents, sponsors, or any other person or persons associated with proAV (including Third Parties), or any of our subsidiaries or their employees are also subject to this policy's rules. The Company does not tolerate any form of bribery, corruption, extortion or embezzlement and takes a zero tolerance approach to bribery and corruption. This policy is intended to support compliance with the Bribery Act 2010 and applies to all employees and persons acting on behalf of proAV.

### 2.0 What is Bribery?

A bribe is a financial or other advantage that is offered, promised, given, requested, agreed to be received, or accepted with the intention of inducing, rewarding or otherwise resulting in improper performance.

### 3.0 Gifts and Hospitality

This policy does not prohibit normal and appropriate hospitality. If by giving or receiving hospitality a real or perceived conflict of interest will be created, employees and Third Parties must refuse to give or receive the gift or hospitality.

Employees and Third Parties are prohibited from accepting and giving a gift.

The giving or receiving of hospitality is not prohibited, if the following requirements are met:

- it is not made with the intention of inducing, rewarding or otherwise resulting in improper performance in order to obtain or retain a business or other advantage to the Company.
- is not offered, promised or given to a foreign public official if the employee or Third Party intends to influence the foreign public official in his or her official capacity to obtain or retain business or an advantage in the conduct of business for the Company.
- it is appropriate in the circumstances.
- taking into account the reason, it is of an appropriate type and value and given at an appropriate time and is not to be lavish.
- it is given or received openly, not secretly.

Employees and Third Parties are prohibited from accepting from or offering gifts or hospitality to any public officials or representatives, or politicians or political parties, without the prior written approval by a duly authorised representative of the Company.

#### **4.0 Facilitation Payments**

The Company does not make, and will not accept, facilitation payments of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. They are not commonly paid in the UK, but can be found in some other jurisdictions.

It is not acceptable for employees and Third Parties to:

- give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to “facilitate” or expedite a routine procedure.
- engage in any activity that might lead to a breach of this policy.

#### **5.0 Donations**

Employees and Third Parties must not accept or make contributions to political parties or charitable donations for or on behalf of the Company.

#### **6.0 Employees Responsibilities**

Employees must ensure the information contained within this policy, and with any training or other anti-bribery and corruption information given are comprehended, understood and read.

Employees are required to avoid any activity that might lead to, or suggest, a breach of this policy and procure that those they are involved with to provide services for or on behalf of the Company comply with this policy.

Employees and Third Parties are required to ensure that they and those they are involved with to provide services for or on behalf of the Company:

- have in place appropriate policies to implement this policy.
- allow the Company rights of audit of internal control systems financial records and procedures for compliance.
- immediately report any suspicion or act of bribery or corruption.
- keep financial records and have appropriate internal controls in place which evidence the business reason for making payment.
- ensure all expenses claims relating to the hospitality, gifts or expenses incurred are kept and specifically record the reason for the expenditure.
- keep proper books and accounts.

If any employee breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct. proAV has the right to terminate a contractual relationship with an employee if they breach this anti-bribery policy.

## **7.0 Training and Communication**

proAV and Third Parties are required to implement appropriate training and communicate to ensure compliance with these anti bribery and corruption standards to at least the same standard as this policy. Our zero-tolerance approach to bribery and corruption must be communicated to all employees, suppliers, contractors and business partners of Third Parties and those they are involved with to provide services for or on behalf of the Company at the outset of any business relationship with them and as appropriate thereafter.

## **8.0 Monitoring and Review**

The Company reserves the right to monitor the effectiveness and review the implementation of this policy and update it from time to time.

## **9.0 Reporting**

Employees and Third Parties are responsible for the prevention, detection and reporting of bribery and other forms of corruption. Employees should report any concerns to their line manager, HR or a board member of the Company as soon as they have any suspicions of such activity.

A handwritten signature in black ink, appearing to read 'Francesca Hazell'.

Francesca Hazell  
**Operations Director**