

Anti Bribery

Policy Statement 2020

Introduction

Sedamyl UK Ltd, hereinafter also referred to as The Company, is committed to promoting and maintaining the highest level of ethical standards in relation to all of its business activities. Its reputation for maintaining lawful business practices is of paramount importance and this policy is designed to safeguard this. Sedamyl UK Ltd therefore has a zero-tolerance policy towards bribery and corruption and is committed to acting fairly and with integrity in all of its business dealings.

Purpose and scope of Policy

This Policy sets out Sedamyl UK Ltd position on any form of bribery and corruption:

- Sedamyl UK Ltd will ensure compliance with anti-bribery laws, rules and regulations, not just within the UK but in any other country within which it may carry out its business.
- Sedamyl UK Ltd will enable employees and persons associated with the Company to understand the risks associated with bribery and to encourage them to report any wrongdoing.
- Sedamyl UK Ltd will provide suitable and secure reporting and ensuring that any information that is reported is effectively dealt with.

This Policy applies to all permanent and temporary employees of the Company. It also applies to any individual or corporate entity associated with the Company, including, but not limited to, directors, contractors, consultants, seconded staff, agents and suppliers.

Legal obligations

The UK legislation on which this Policy is based is the Bribery Act 2010 and it applies to the Company's conduct both in the UK and abroad. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

It is an offence in the UK to:

- offer, promise or give a financial or other advantage to another person (i.e. bribe a person), whether within the UK or abroad, with the intention of inducing or rewarding improper conduct
- request, agree to receive or accept a financial or other advantage (i.e. receive a bribe) for or in relation to improper conduct
- bribe a foreign public official.

You can be held personally liable for any such offence.

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- It is also an offence in the UK for an employee or an associated person to bribe another person in the course of doing business intending either to obtain or retain business, or to obtain or retain an advantage in the conduct of business, for the Company.

Sedamyl UK Ltd can be liable for this offence where it has failed to prevent such bribery by associated persons.

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All employees and associated persons are required to comply with anti-bribery and anti-corruption legislation that applies

- act honestly, responsibly and with integrity
- Operate in an ethical, professional and lawful manner at all times.

Bribery of any kind is strictly prohibited. Under no circumstances should any provision be made, money set aside, or accounts created for the purposes of facilitating the payment or receipt of a bribe.

The Company recognises that industry practices may vary from country to country or from culture to culture. What is considered unacceptable in one place may be usual practice in another.

Nevertheless, a strict adherence to the guidelines set out in this Policy is expected of all employees and associated persons at all times.

Business Gifts/Hospitality

The giving of business gifts to clients, customers, contractors and suppliers is not prohibited provided the following requirements are met:

The gift is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage

- it complies with local laws
- it is given in the Company's name, not in the giver's personal name
- it does not include cash or a cash equivalent (such as gift vouchers)
- it is of an appropriate and reasonable type and value and given at an appropriate time
- it is given openly, not secretly
- it is approved in advance by a director of the Company.

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In summary, it is not acceptable 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, or to accept a payment, gift or hospitality from a third party that you know or suspect is offered or provided with the expectation that it will obtain a business advantage for them.

Any payment or gift to a public official or other person to secure or accelerate the prompt or proper performance of a routine government process, otherwise known as a “facilitation payment”, is also strictly prohibited. Facilitation payments are not commonly paid in the UK.

Responsibilities

It is the contractual duty and responsibility of all employees and associated persons to take whatever reasonable steps are necessary to ensure compliance with this Policy.

You must immediately disclose to the Company any knowledge or suspicion you may have that you, or any other employee or associated person, has plans to offer, promise or give a bribe or to request, agree to receive or accept a bribe in connection with the business of the Company.

Whistle Blowing

The Company is committed to taking appropriate action against bribery and corruption.

If you have a concern or suspicion report this directly to your manager or next most senior manager if the incident relates to them. During an investigation period we will keep your information confidential as long as reasonably practical.

Sedamyl UK Ltd will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. It is also committed to ensuring nobody suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or corruption offence has taken place or may take place in the future.

Sanctions for breach

A breach of this Policy will constitute a disciplinary offence and will be dealt with in accordance with the Company’s disciplinary procedure. Depending on the gravity of the offence, it may be treated as gross misconduct and could result in summary dismissal.

As far as associated persons are concerned, a breach of this Policy could lead to the suspension or termination of any relevant contract, sub-contract or other agreement.

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Monitoring compliance

The Company Director has lead responsibility for ensuring compliance with this Policy and will review its contents on a regular basis. They will be responsible for monitoring its effectiveness and ensuring that this Policy complies with the Company's legal and ethical obligations.



A handwritten signature in black ink, appearing to read 'Elena Frandino', written over a horizontal dashed line.

Elena Frandino
Managing Director
19/01/2020