

Anti Bribery Policy



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The Anti Bribery Policy supports IDDQD Limited's commitment to implementing and enforcing effective systems to counter bribery. Therefore, it is the Company's policy to conduct all aspects of our business in an honest and ethical manner at all times.

This policy applies to all individuals working for the Company, including anyone providing services to the Company such as consultants or contractors.

Our Purpose

This document aims to help IDDQD Limited act in accordance with the Bribery Act 2010, maintain the highest possible standards of business practice, and advise individuals of the Company's 'zero tolerance' to bribery.

IDDQD Limited is committed to recruiting, developing and supporting its talented and experienced employees to maintain its status as an international professional services consultancy providing a range of solutions for the lifecycle of infrastructure, construction and asset management programmes.

Our aim is to create a culture where individuals take responsibility, in partnership with the business, for their own development and the success of the business. IDDQD Limited is committed to ensuring the equality of opportunity for its people.

Scope

The policy applies to all direct employees of IDDQD Limited.

Policy Aims

- To ensure that every employee has a shared understanding of the applicable IDDQD Limited policy, strategy, vision and behaviours and that they are aware of the role that they play in helping to achieve these;
- To continue to monitor and measure the success and compliance of this policy to ensure its legality and organisational effectiveness.

We are committed to the highest standards of ethical conduct and integrity in our business activities. In accordance with the Bribery Act 2010 we will not tolerate any form of bribery.

This applies to all employees of IDDQD Limited, and to temporary workers, consultants, contractors, agents and subsidiaries acting for, or on behalf of, IDDQD Limited (“associated persons”).

Any breach of this policy is likely to constitute a serious disciplinary, contractual and criminal matter for the individual concerned and may cause serious damage to the reputation and standing of IDDQD Limited.

IDDQD may also face criminal liability for unlawful actions taken by its employees or associated persons under the Bribery Act 2010.

Bribery Act 2010

Under the Bribery Act 2010, a bribe is a financial or other type of advantage that is offered or requested with the:

- intention of inducing or rewarding improper performance of a function or activity; or
- knowledge or belief that accepting such a reward would constitute the improper performance of such a function or activity.

A relevant function or activity includes public, state or business activities or any activity performed in the course of a person’s employment, or on behalf of another company or individual, where the person performing that activity is expected to perform it in good faith, impartially, or in accordance with a position of trust.

A criminal offence will be committed under the Bribery Act 2010 if:

- an employee or associated person acting for, or on behalf of, IDDQD Limited offers, promises, gives, requests, receives or agrees to receive bribes; or
- an employee or associated person acting for, or on behalf of, IDDQD Limited offers, promises or gives a bribe to a foreign public official with the intention of influencing that official in the performance of their duties (where local law does not permit or require such influence; and
- IDDQD Limited does not have the defence that it has adequate procedures in place to prevent bribery by its employees or associated persons.

We prohibit employees or associated persons from offering, promising, giving, soliciting or accepting any bribe. The bribe might be cash, a gift or other inducement to, or from, any person or company, whether a public or government official, official of a state-controlled industry, political party or a private person or company, regardless of whether the employee or associated person is situated in the UK or overseas. The bribe might be made to ensure that a person or company improperly performs duties or functions (for example, by not acting impartially or in good faith or in accordance with their position of trust to gain any commercial, contractual or regulatory advantage for IDDQD Limited in either obtaining or maintaining company business, or to gain any personal advantage, financial or otherwise, for the individual or anyone connected with the individual.

This prohibition also applies to indirect contributions, payments or gifts made in any manner as an inducement or reward for improper performance, for example through consultants, contractors or sub-contractors, agents or sub agents, sponsors or sub sponsors, joint venture partners, advisors, customers, suppliers or other third parties.

Reporting Suspected Bribery

We depend on you to ensure that the highest standards of ethical conduct are maintained in all its business dealings.

You are encouraged to report any concerns that they may have to the CEO or their line manager as soon as possible. Issues that should be reported include:

- Any suspected or actual attempts at bribery;
- Concerns that other employees or associated persons may be being bribed; or
- Concerns that other employees or associated persons may be bribing third parties, such as clients or government officials.

Employees or associated persons who report instances of bribery in good faith will be supported. We will fully investigate any instances of alleged or suspected bribery.

Anyone suspected of bribery may be suspended from their duties while the investigation is being carried out. We will invoke our disciplinary procedures where any employee is suspected of bribery, and proven allegations may result in a finding of gross misconduct and immediate dismissal. We may terminate the contracts of any associated persons, including consultants or other workers who act for, or on behalf of, IDDQD Limited who are found to have breached this approach.

We may also report any matter to the relevant authorities, including the Director of Public Prosecutions, Serious Fraud Office, Revenue and Customs Prosecutions Office and the police. We will provide all necessary assistance to the relevant authorities in any subsequent prosecution.

The senior management team is responsible for this policy including compliance, review and are committed to viewing the policy on an annual basis.



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