

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

INTRODUCTION

Tayside Contracts values its reputation and is committed to carrying out all its business ethically and with integrity. Tayside Contracts takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships.

SCOPE OF POLICY

This policy applies to all individuals working at all levels and grades within Tayside Contracts and to all contractors, consultants and agency workers regardless of permanent, temporary or fixed term employment status.

PRINCIPLES

Tayside Contracts does not tolerate any form of bribery which is intended to obtain or retain business or business advantage for the organisation including:

- Offering, promising or giving bribes, financial or otherwise (active bribery)
- Requesting, agreeing to receive or receiving bribes, financial or otherwise (passive bribery)

The Bribery Act 2010 does not automatically prevent the acceptance of corporate hospitality and gifts however, hospitality should only be accepted in accordance with Tayside Contracts' Hospitality and Gifts Policy.

If Tayside Contracts becomes aware of any incidences of bribery the organisation will not hesitate in providing a full disclosure and reporting it to the appropriate authorities. Tayside Contracts will also fully cooperate with any investigations under the Bribery Act.

No employee of Tayside Contracts will suffer any detriment for losing business by refusing to pay a bribe.

PUBLIC AND PRIVATE CONTRACTS

Tayside Contracts will conduct the relevant due diligence on all parties with whom it enters into business arrangements, which will include assessing whether they have an anti-bribery policy and whether they understand and are happy to comply with Tayside Contracts' Anti-Bribery and Anti-Corruption Policy.

Tayside Contracts will make it clear in all business tenders that it does not tolerate any form of bribery.

Managers who have direct contact with prospective or existing suppliers, contractors and other third parties have a duty to communicate and implement our policy.

RESPONSIBILITIES AND DISCLOSING GENUINE CONCERNS

Any employee who has been offered a bribe, turns down a bribe, or has a genuine concern regarding bribery within Tayside Contracts is encouraged to disclose this to their line manager.

If an employee would prefer to disclose information confidentially they may make a disclosure under Tayside Contracts' Whistleblowing (Confidential Disclosure of Information) Policy.

All disclosures will be investigated thoroughly and any individual who makes a disclosure in good faith will not suffer detrimental treatment regardless if the information provided is later identified as false.

Any malicious allegations made by employees will be investigated in accordance with Tayside Contracts' Disciplinary Policy and if proven the individual who made the malicious allegation may be subject to disciplinary action.

POLICY VIOLATIONS

Any breach of this policy is likely to be regarded as gross misconduct and will be addressed in accordance with Tayside Contracts' Disciplinary Procedure.

In addition to disciplinary action it should be noted that under the Bribery Act 2010 there are additional implications for employees and the organisation, as follows:

- Any individual employee found guilty of an offence is liable to face imprisonment for up to ten years, or a fine, or both.
- Tayside Contracts may also face prosecution and, if found guilty, could face an unlimited fine.

RELATED POLICIES

The Anti-Bribery and Anti-Corruption Policy links to the following policies, which can be found on the intranet, from your line manager and from the HR Admin Team:

- The Confidential Disclosure of Information Policy
- Hospitality and Gift Policy
- Employee Code of Conduct
- Disciplinary Policy

The above list is not exhaustive.

POLICY REVIEW

The Anti-Bribery and Anti-Corruption Policy will be reviewed at three yearly intervals, or as required by legislative changes.

GENERAL DATA PROTECTION REGULATION

Tayside Contracts respects the privacy of our employees, any personal data processed during the application of this policy will be in line with Data Protection Legislation. Further information on how we may process personal data for the purpose of applying this policy can be found in our Privacy Notice.

Should you have any queries or require further clarification regarding any aspects of this policy or related policies please contact, HR Services on 01382 812721 or employment.policies@tayside-contracts.co.uk

If you would like this document translated into another language or in another format such as audio or large print then please contact Angie Thompson, Equalities and Communications Manager on 01382 834165 or angie.thompson@tayside-contracts.co.uk