



Bader Malan Limited
Neville House, 17 Richmond Close, Bookham Nr. Leatherhead
Surrey KT22 9NX
Email: Info@badermalan.co.uk
Company Registration Number 4329913

1. Purpose

Bader Malan Ltd is committed to maintaining the highest standards of ethics, integrity, and legality in all its business dealings. The purpose of this policy is to outline the company's position on preventing and prohibiting bribery and corruption, in line with the UK Bribery Act 2010, and to provide guidance on recognizing and addressing such issues.

2. Scope

This policy applies to all employees, directors, officers, contractors, consultants, agents, subsidiaries, suppliers, and any other third parties acting on behalf of Bader Malan Ltd, regardless of their location. It covers all business dealings and transactions in all jurisdictions in which we operate.

3. Definition of Bribery and Corruption

- **Bribery** is offering, giving, receiving, or soliciting something of value (such as money, gifts, hospitality, or favours) to influence the actions or decisions of an individual or entity in their official capacity to obtain or retain business or secure an improper advantage.
- **Corruption** is the abuse of entrusted power for private gain.

4. Policy Statement

Bader Malan Ltd has a **zero-tolerance** approach to bribery and corruption. We prohibit any form of bribery, whether direct or indirect, by any individual or entity acting on behalf of the company. We are committed to:

- **Compliance with Laws:** Adhering to all applicable anti-bribery and anti-corruption laws, including the UK Bribery Act 2010.
- **Ethical Conduct:** Conducting all business activities ethically, honestly, and with integrity.
- **Prevention:** Implementing effective systems and controls to prevent bribery and corruption.

5. Prohibited Activities

The following activities are strictly prohibited:

1. **Offering, Promising, or Giving Bribes:** No employee or third party acting on behalf of Bader Malan Ltd shall offer, promise, or give any financial or other advantage to any person with the intention of influencing their actions or decisions in favour of Bader Malan Ltd.

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2. **Requesting, Agreeing to Receive, or Accepting Bribes:** No employee or third party acting on behalf of Bader Malan Ltd shall request, agree to receive, or accept any financial or other advantage from any person in exchange for improper performance.
3. **Facilitation Payments:** All forms of facilitation payments (small payments made to expedite routine government actions) are strictly prohibited.
4. **Gifts and Hospitality:** Gifts, hospitality, or entertainment that could be perceived as influencing business decisions or actions are not permitted. All gifts and hospitality must be reasonable, proportionate, and for legitimate business purposes. Employees must seek approval before accepting or offering any gifts or hospitality over a specified value (£10).
5. **Donations:** Charitable donations and sponsorships must be transparent, legal, and aligned with the company's values and goals. Political donations are strictly prohibited.

6. Responsibilities

- **Employees:** All employees are responsible for understanding and complying with this policy. Employees must report any actual or suspected breaches of this policy immediately.
- **Management:** Management is responsible for promoting a culture of compliance and integrity, ensuring that employees understand this policy, and implementing procedures to monitor compliance.
- **Compliance Officer:** The Compliance Officer Louise Nelligan is responsible for overseeing the implementation of this policy, providing guidance and training, and investigating any reported breaches.

7. Reporting Concerns

If you suspect any bribery or corruption or become aware of any violation of this policy, you must report it immediately using one of the following channels:

- **Line Manager:** Report directly to your immediate line manager.
- **Compliance Officer:** Report to the designated Compliance Officer at louise@badermalan.co.uk.
- **Whistleblowing Hotline:** Use the confidential whistleblowing hotline 01372 439355. Please detail as whistleblowing call.

All reports will be treated confidentially, and no one will suffer any form of retaliation or detriment for reporting concerns in good faith.

8. Training and Awareness

Bader Malan Ltd will provide regular training to employees, particularly those in high-risk roles such as procurement, sales, and finance, to help them:

- Understand the risks and signs of bribery and corruption.
- Learn how to report potential cases of bribery and corruption.
- Stay updated on new developments in legislation and best practices.

9. Consequences of Non-Compliance

Breaches of this policy may result in disciplinary action, up to and including dismissal, and may lead to criminal prosecution. Any third-party business partners found to be in violation of this policy may have their contracts terminated.

10. Monitoring and Review

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This policy will be reviewed annually or sooner if required by changes in legislation or circumstances to ensure it remains effective and aligned with legal requirements and best practices.

11. Contact Information

For any questions or concerns regarding this policy, please contact:

- **Compliance Officer:** Louise Nelligan louise@badermalan.co.uk
- **Confidential Hotline 01372 :439355**

12. Governing Law

This policy shall be governed by and construed in accordance with the laws of England and Wales.

Approval and Implementation

This policy is approved by the Board of Directors and is effective as of 28th August 2024.

Louise Nelligan

Director