

ANTI-BRIBERY & CORRUPTION POLICY

Policy Statement

Love Success is fully committed to compliance with the requirements of the Bribery Act 2010 and will ensure that it conducts its business in an honest and ethical manner at all times. The company has therefore created procedures to ensure that all staff are fully aware of and will abide by their duties and responsibilities under this legislation.

This policy aims to ensure compliance with anti-bribery legislation and regulations in both the UK and in any other country where the company carries out its business.

Scope of the Policy

All employees, contractors, consultants and anyone else acting on behalf of the company is required to comply with this policy when dealing with job applicants, clients (prospective or current), suppliers, partners and anyone else with whom they come into contact during the course of their employment / engagement.

Responsibilities

It is the direct responsibility of Head of Finance to ensure the implementation of this policy on a day- to-day basis; however, all employees have a responsibility to accept their personal involvement in applying it and must:

- Comply with the Bribery Act 2010 and with any other anti-bribery or anti-corruption legislation that applies in any part of the world in which the company does business.
- Be familiar with this policy and ensure that it is followed by both themselves and employees for whom they have a responsibility.
- Act honestly and with integrity in all dealings.
- Notify their line manager of any alleged or suspected instances of bribery or corruption.
- Be aware of their obligations under current bribery and anti-corruption legislation.

Disciplinary action may be taken against any employee who acts in breach of this policy. Disciplinary action may include summary dismissal in the case of a serious breach or repeated breaches of this policy. In other cases, it may include a verbal or written warning. Disciplinary action may also be taken against any employee who makes malicious or vexatious allegations of bribery or corruption. Such action will be taken in accordance with the Company's disciplinary procedure.

Consultants or contractors acting on behalf of the company who breach this policy may be subject to having their contract suspended pending investigation or terminated with immediate effect.

Breaches of the Bribery Act 2010 may also result in the employee, consultant, contractor or other person responsible being held personally liable, and if found guilty, subject to receiving a criminal record and up to 10 years' imprisonment.

If the company is found to have taken part in bribery or corruption or fails to implement adequate procedures to prevent bribery and corruption, it too could face criminal proceedings and an unlimited fine as well as being prevented from tendering for Government contracts.

The Act also has a global reach which means that anyone normally resident in the UK can be prosecuted for bribery offences committed anywhere in the world. Also any company that does business in the UK can also be prosecuted for bribery offences committed anywhere in the world.

Bribery & Corruption

The company defines bribery as offering inducements, commissions or rewards of any kind; promising or giving an advantage; or requesting or agreeing to receive or accept an advantage in any of its dealings with clients, individuals acting on behalf of clients or any other third parties.

Love Success confirms that none of its employees (or any other person acting on its behalf) have been suspended from doing business due to an allegation of fraud, misrepresentation, bribery, corruption, tax evasion, terrorism or other related activities or have been charged with any criminal act. Similarly no employee or any other person acting on Love Success's behalf has been found to be in breach of competition / anti-trust legislation or been barred from bidding on any Government of public contract either in the UK or abroad.

Love Success (including its employees and any other person acting on its behalf) will not offer inducements, commissions, rewards of any kind outside of the company's commission scheme; or participate in any act of bribery as defined above.

To ensure compliance, Love Success will:

- Forego contracts rather than be involved in offering, promising, soliciting, demanding, giving or accepting bribes in return for business / commercial advantage.
- Support employees faced with losing a contract or sale owing to the company's refusal to become involved in bribery or corruption. No employee will suffer demotion, penalty or any other adverse consequence for refusing to pay bribes or reporting suspected malpractice, even if such refusal/reporting results in loss of business.
- Use its best endeavours to ensure that employees or any other person acting on its behalf does not accept, request or offer any type of reward in return for a favour/favourable treatment.

- Not act improperly or offer / accept incentives, gifts or hospitality with the intention of persuading anyone to act improperly.
- Not make political contributions, donations or sponsorships and so avoid the perception that the intention is to gain an advantage as a direct result of the contribution, donation or sponsorship.
- Not engage a politician, former politician or candidate for political office as a consultant under any circumstances.
- Not attempt to influence a current or former public official (i.e. an official who exercises a public function or acts on behalf of a public organisation; or anyone who holds a legislative, administrative or judicial position of any kind, whether appointed or elected) in the performance of their duties either in the UK or internationally.
- Use its best endeavours to ensure that any payments or incentives to third parties that could subsequently be construed as a bribe are recorded together with the business reason for offering/making them.
- Ensure that employees and any other person acting on behalf of the Company are aware that they are expected to act honestly and within the law (including the Bribery Act 2010) and will be requested to confirm their understanding of, and compliance with this requirement in writing prior to entering into any type of business or employment relationship.
- Seek to mitigate risk of bribery through conducting a risk assessment in relation to local business conditions and customs prior to engaging in business activities outside the UK.
- Extend a zero tolerance approach to acts of bribery and has procedures in place to identify and deal with potential irregularities that may be construed as bribery or corruption in line with current legislation.
- Co-operate fully with the appropriate authorities to investigate any allegations of bribery or corruption.

Conflicts of Interest, Corporate Gifts and Hospitality

Love Success holds the trust and confidence of those with whom it deals, including clients, suppliers and employees as fundamental to its success. Conflicts of interest potentially undermine the relationship of the Company with its partners. In order to help preserve and strengthen these relationships, the Company has developed rules and guidelines concerning the conduct of its officers and employees aimed at minimising the possibility of conflicts of interest.

Employees may not accept corporate hospitality or gifts which could be considered an incentive or enticement, particularly if they have the potential to place the recipient under any obligation or if they have the potential to create any type of conflict of interest.

Any corporate gifts or hospitality (whether being given or received) must be disclosed to and approved by the Managing Director prior to being given / accepted. Details of such gifts including the purpose of the gift, the giver and recipient, the nature of the gift/hospitality, its value and who has approved it must be fully documented in the Gifts/Hospitality Register. This register will then be audited by the Finance Director on a monthly basis. Any corporate gift must be given openly (not in secret) in the name of the company and not be construed as coming from a particular individual.

Gifts should not include cash or a cash equivalent.

Corporate gifts are aimed at thanking customers or suppliers for their loyalty and custom and not as an incentive or inducement for future favourable treatment or business.

Promotional gifts without significant value (e.g. stationery, chocolates, or other gifts under the value of £25) need not be disclosed, but should be shared with other employees. If it is felt that any gift received might constitute an act of bribery, then the gift must be passed to the Managing Director who will return it to the donor explaining the company policy.

Love Success will operate in accordance with the policies, procedures and restrictions of its clients in relation to corporate hospitality, gifts or an incentive where such information forms part of a contract or has been specified in writing to the company.

Common Indicators of Bribery/Corruption

This list (compiled by the Serious Fraud Office) is not exhaustive and the ingenuity of those involved in bribery and corruption knows no bounds!

Employees, contractors, consultants and anyone else acting on behalf of the company should beware of, and report:

- Any abnormal cash payments (in terms of value, method of payment, use of unusual bank accounts or via a country with whom the transaction/company has no connection).
- Pressure exerted for payments to be made urgently or ahead of schedule.
- Lavish gifts being received.
- Any individual who is secretive or insists on dealing with specific clients/suppliers himself or herself, even if he/she is ill or on holiday.
- People making unexpected or illogical business decisions.
- Missing documents or records regarding meetings or decisions.
- Company procedures or guidelines not being followed.
- Bypassing of normal tendering/sign off procedures.
- Agreeing to contracts that are clearly not favourable to the organisation.
- Invoices being agreed in excess of the contracted value without reasonable cause
- People appearing to enjoy a lifestyle that appears to be clearly outside of their earnings potential/circumstances.

Reporting & Disclosure Procedure

Reporting

Love Success requires that employees and any other person acting on behalf of the Company reports any allegation or suspicion of bribery or malpractice immediately to their immediate line Manager who will record details of the allegation and conduct a full investigation.

All records and supporting documentation must be collated and maintained with strict accuracy and completeness – nothing will be considered “off the record” to conceal improper payments or behaviour.

Any disclosure you make will be kept confidential during any investigation to the extent that it is practicable and appropriate. Love Success will support anyone raising a genuine concern in good faith under this policy, even if they turn out to be mistaken.

Where it is deemed appropriate a full report will be made to the relevant authorities or police.

Disclosure

Love Success requires any employee or any other person acting on behalf of the Company to disclose to their Line Manager prior to commencing / throughout employment / engagement or assignment with the company:

- Details of any relative or family member who is a current or former Government or public official or is a candidate for political office.
- If they have been suspended from doing business due to an allegation of fraud, misrepresentation, bribery, corruption, tax evasion, terrorism or other related activities or have been charged with any criminal act.
- If they have been found to be in breach of competition / anti-trust legislation or have been barred from bidding on any Government of public contract either in the UK or abroad.

Training

Details of this policy will be covered as part of the company induction procedure for new employees. All contractors and consultants will also be informed of this policy at the outset of any agreement/assignment. This will include informing all parties of their responsibilities and the process they should follow in the event of suspected or alleged incidence of bribery or corruption.

Review

The Directors will maintain a register of anti-bribery laws and will monitor changes to such laws and any court decisions to support the review of this policy. As such this policy may be altered from time to time in light of legislative changes or other prevailing circumstances.