



1. INTRODUCTION

Bribery and corruption is, unfortunately, a feature of corporate and public life in many countries across the world. Governments, businesses and non-governmental organisations are working together to tackle the issue and as part of the UK Government's commitment to eradicating bribery, it passed the Bribery Act 2010 which came into force in 2011.

Callitech Ltd trading as Moneypenny ("Moneypenny") has a clear anti bribery and corruption policy and we support our colleagues to make decisions in line with our stated position. Moneypenny does not tolerate any form of bribery and corruption.

2. PURPOSE

The purpose of this Policy is to set out the responsibilities of Moneypenny staff in observing and upholding our position on bribery and corruption. It also includes the responsibilities of each of our partners, suppliers and other third parties in ensuring compliance with our Policy.

There are no exceptions to this Policy. Moneypenny does not tolerate any form of bribery and corruption. Violation of this Policy may be grounds for dismissal for gross misconduct, immediate termination of contract, prosecution or additional sanctions.

Please note that if local laws, codes of conduct, or other regulations in a particular country or region are more restrictive on this subject, or require government approval of the transaction, then any Moneypenny colleague or representative, including any partners, supplier, intermediaries or consultants, operating in that country or region must fully comply with the more restrictive requirements.

3. SCOPE

This Policy applies to all Moneypenny colleagues and extends to all our business dealings and transactions in all countries in which we operate.

This Policy also applies to our business partners including suppliers, intermediaries, joint venture partners and other third parties.

4. OUR POLICY

Moneypenny is the world's leading telephone answering and outsourced switchboard provider. In delivering our world class standards, we want to ensure that we maintain integrity in our conduct at all times. This means that Moneypenny will not engage in bribery or any form of unethical inducement or payment including facilitation payments and "kickbacks".

All colleagues, as well as any party working on Moneypenny's behalf, must not make, offer to make, promise or make payments, or give anything of value to any third party including any partner, supplier or government official to assist Moneypenny in obtaining or retaining an improper business advantage, whether or not any benefit is actually received.

5. GIFTS AND HOSPITALITY

All colleagues, partners, suppliers and other third parties are required to avoid any activities that might lead to, or suggest, a conflict of interest with the business of Moneypenny.

Our guiding principle on corporate hospitality is that rather than an individual have the benefit of corporate hospitality from a client, supplier or partner, we would rather the business has a reduced cost of goods or services.

6. RED FLAGS

All colleagues and representatives (including partners and suppliers) are responsible for reporting potential issues and should be aware of the following non-exhaustive list of red flags:

- Accusations of improper business practices of any Moneypenny colleague or third party;
- Family or other relationships between any Moneypenny colleague or third party that could influence the decision of a Moneypenny colleague;

- Reluctance of a Moneypenny colleague to allow another colleague to deal with a particular supplier;
- Demands by a partner or supplier for extraordinarily high commissions or fees for services;
- Requests for payments to be made in a third country or to another name or company different from the one earning the commission;
- A third party insisting that its identity remain confidential or refuses to divulge the identity of its owners.

7. RECORD-KEEPING PROVISIONS

Colleagues are responsible for making accurate and reasonably detailed entries in official records of the company. Colleagues must never:

- Pay expenses that are excessive, lack adequate description or supporting documentation, or appear to be improper;
- Use personal funds to accomplish what is otherwise prohibited by this Policy.

8. TRAINING AND COMMUNICATIONS

We will communicate this policy and relevant guidance to colleagues across Moneypenny through our established internal communication channels. Managers, colleagues and agents will receive relevant training on how to implement this policy in the scope of their employment.

Each departmental head will be responsible for ensuring that its department complies with the policy and will be required to report compliance on an annual basis. New colleagues in key departments will be required to undertake training on the Policy

9. RESPONSIBILITIES

Moneypenny's board of directors has specifically directed issuance and implementation of Moneypenny's Anti Bribery Policy and retains ultimate responsibility for ensuring that it meets its obligations under the Bribery Act 2010.

10. RAISING CONCERNS AND SEEKING GUIDANCE

Colleagues, suppliers, partners or other third parties are encouraged to raise concerns about any instance of non compliance at the earliest possible stage.

Colleagues can speak directly to their line manager or talk to an independent and trusted senior manager. Colleagues, suppliers, partners or other third parties can also make contact confidentially with Moneypenny by writing to:

**Managing Director
Moneypenny
Western Gateway
Wrexham
LL13 7ZB**

Or by telephone on **0345 123 3700**.

Anyone raising a concern in good faith will not be criticised or penalised in any way even if it is shown, after investigation, that they were mistaken. Any form of reprisal or victimisation against anyone who has raised a genuinely held concern is forbidden and will not be tolerated and itself will be treated as a disciplinary matter.

11. PENALTIES

Violations of the Bribery Act 2010 and other anti-corruption legislation are a serious matter and could result in significant penalties for Moneypenny and for those individuals responsible for an offence. Penalties include imprisonment for individuals committing the offence for up to 10 years together with unlimited fines for individuals and the business. Senior Officers who were aware of the bribes may also face penalties. Fines imposed on individuals will not be paid by Moneypenny. A violation can also result in disciplinary action by Moneypenny, up to and including termination of employment.