

Bluemay Limited

Ethical, Bribery and Anti-corruption Policy

1. **Scope and application of this policy**

Bluemay Limited (“Bluemay” or “the Company”) is committed to the highest level of ethical standards to ensure impartiality, integrity and objectivity in relation to the management of its activities, and has adopted a zero tolerance policy to bribery and corruption. The conduct of Bluemay Directors, staff and others directly involved in Company business activities (including those businesses or individuals acting on behalf of the Company) form an essential part of these arrangements and ethical standards. General rules relating to conduct and disciplinary action are contained within employment terms and conditions; specific procedures in place relating to the prevention of bribery and corruption are summarised within this policy.

2. **Bribery**

Bluemay will not tolerate any internal action which encourages, implies, bestows, tolerates or promises an unfair, unlawful, improper or unethical advantage to any individual, group or organisation, regardless of whether there is financial inducement or not. Bluemay will not tolerate the acceptance or giving of bribes to induce a favourable decision or other business outcome. At all times Bluemay expects its Directors, staff and others acting on its behalf to conduct their work ethically and to fully comply with their terms and conditions of employment and with Company policies and procedures.

3. **Declaration of conflicts of interest policy**

A ‘conflict of interest’ is considered to be any connection or association with a third party that is (or appears to be) against the best interests of Bluemay, or which could enable someone reasonably to be suspected of using their position with Bluemay to gain an unfair advantage for or from a third party. Conflicts of interest are best avoided altogether; however, the Company acknowledges that conflicts of interest (and potential conflicts) are sometimes unavoidable. In such circumstances the principles of openness and integrity apply and there is a requirement to disclose such a conflict or the risk of a conflict to a Director or the General Manager immediately.

4. **Gifts policy**

Employees and consultants are only permitted to accept and keep occasional gifts of below £50 in value and never in cash. Regular gifts of any value must be refused or approved by a Director or the General Manager. Accepting and keeping all other gifts is not permitted. In the rare circumstances where a gift cannot be returned or declined, donation records must be maintained and the gift given to charity or (if appropriate) put on permanent display. The giving of gifts of any value must be approved by a Director or the General Manager.

5. **Hospitality policy**

All hospitality offered by third parties to an employee and the giving of hospitality to third parties by an employee must be approved by a Director or the General Manager.

6. **Reporting actual or potential bribery concerns**

It is important that all staff are able to report their concerns promptly and without fear of reprisal or victimisation and are aware of the means to do so. This policy underlines the Company’s commitment and support for those that come forward to express their concerns. Any suspicion of bribery, corruption, fraud, theft or other irregularity should be reported, as a **matter of urgency**, to the General Manager or a Director or, if more appropriate, to a Confidential Counsellor as set out in the Company’s Dignity at Work Policy.

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Where bribery is suspected, this is a potential criminal offence and will be reported to the police. Allegations of bribery will be investigated thoroughly and may result in appropriate disciplinary and/or police reporting action where substantiated.

7. Risk assessment, due diligence and review

The process of regular supplier and customer reviews will be used to conduct an assessment of the risk of bribery and corruption in the Company's business dealings. Special attention will be paid to joint venture and sales agency business dealings, hospitality records, dealings with businesses in countries known to have a high propensity for corruption and past history. All new customers and suppliers will have their attention drawn to the Company's Compliance Statements on the Bluemay website and where appropriate similar statements of compliance will be requested and/or training given.

8. Training

All Directors and staff of Bluemay will be given training as necessary to ensure knowledge of and compliance with the Company's Ethical, Bribery and Anti-corruption Policy.

9. Purchasing

Bluemay will conduct its purchasing function in a manner not only that complies with all applicable laws and regulations but also that complies with this and other Company Compliance Statements as found on the Bluemay website, including (but not limited to) Modern Slavery, Environmental and Health and Safety policies. Bluemay expects its Suppliers to operate with similar policies and will enter into constructive dialogue with its business partners to achieve best practice in these areas.

10. Counterfeit or pirated goods

Bluemay will not knowingly purchase, use, distribute or offer for resale goods which are not genuinely manufactured or supplied by the owner of the trademark or identification on the goods, or which do not have genuine identification on them. The Company will work closely with its suppliers to ensure that counterfeit or pirated goods are not used and will report any suspected trade mark or passing off infringements to the trade mark owner and/or to trading standards authorities.

11. Continuous improvement

Bluemay and its Directors and staff will seek continuous improvement in the way that the Company conducts business with customers and suppliers and will review regularly the various Compliance Statements which support this and other Company policies..