



DIGITALPOWER

Anti-Bribery and Corruption Policy

Revision History

Date	Description	Version	Author
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Management Control

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Anti-Bribery and Corruption Policy

Digital Power is committed to ensuring that all our commercial dealings meet the highest professional standards. It would never be acceptable for anyone to accept or offer bribes in any business transaction.

See [Bribery Act 2010](#)

Bribery is defined as giving or receiving an unearned reward to influence someone's behaviour.

Corruption is any improper or unlawful behaviour that seeks to gain an advantage through illegitimate means

Bribes may come in a variety of forms such as corporate hospitality, charitable donations, personal gifts, hospitality as well as money. Any employee being offered any of these must report this to their manager who will advise how to manage the situation. Breaches of this rule will result in disciplinary action up to and including dismissal.

This policy applies to the Directors, our employees throughout the business, suppliers, outsource partners, consultants and to all markets in which we do business.

As part of our induction training all staff will be made aware of this policy and a good video to find out your knowledge can be found [here](#)

Meals, Refreshments, Entertainment and Gifts

There is no prohibition against the acceptance of occasional meals, refreshments, entertainment, gifts, and similar business courtesies that are commonplace and as such fall within conventional norms as long as:

- They are not too extravagant.
- The acceptance of such courtesies from any one person, organisation or business is not habitual.
- Any such courtesies are not offered or do not appear to be offered in exchange for any business "favours" of any kind.
- The acceptance of any such courtesy would not cause the employee to feel uncomfortable about disclosing it to his or her supervisor, or with public disclosure.

Ordinary business entertainment is also acceptable; however, professional misconduct occurs when the value or cost of such entertainment creates or could potentially create a conflict of interest.

Questions about the acceptance of any business courtesies should be directed to your direct supervisor, manager or to the Human Resources department.

Offering Professional Courtesies

In the routine business course, offering professional courtesies is not unusual.

- Making such offers is acceptable as long as it is not done or cannot be perceived as being done to carry favour with or otherwise influence the recipient.
- The use of personal funds or resources within this context is expressly prohibited.
- Accounting for business courtesies should comply with approved company procedures.

The gifting of certain promotional items is generally acceptable as long as such activity complies with acceptable professional norms. Employees with questions or concerns about such activity should consult their direct supervisor or manager. The approval of other courtesies such as meals, refreshments, or entertainment of reasonable value, will be granted as long as:

- The activity does not violate or appear to violate any applicable laws, rules, regulations, or standards of conduct.
- The professional courtesy conforms to applicable norms, is only offered occasionally and is not excessive.
- The professional courtesy is properly documented.

Registering a donation, gift or other

The registration of a donation or gift should be recorded on the [donation or gift list](#) and be approved if over the value of £20.