



## Bribery Act 2010 – Anti-Bribery policy

The key UK legislation on which this policy is based is the Bribery Act 2010 and it applies to **giant's** conduct both in the UK and abroad.

At **giant**, all employees must comply with the terms of the Bribery Act 2010. Therefore, **giant** is committed to acting fairly and with integrity in all of its business dealings and relationships wherever it operates and implementing and enforcing effective systems to counter bribery.

### Purpose and scope

This policy sets out **giant's** position on any form of bribery and corruption and provides guidelines aimed at:

- Ensuring compliance with anti-bribery laws, rules and regulations, not just within the UK, but also in any other country within which **giant** may carry out its business or in relation to which its business may be connected.
- Enabling employees and persons associated with **giant** to understand risks associated with unlawful conduct and to enable and encourage them to be vigilant and to effectively recognise, prevent, avoid and report any wrongdoing, whether by themselves or others.
- Providing suitable and secure reporting and communication channels and ensuring that any information that is reported is properly and effectively dealt with.
- Creating and maintaining a rigorous and effective framework for dealing with any suspected instances of bribery or other unethical conduct.

### Policy

All employees and associated persons are required to:

- Comply with any anti-bribery and anti-corruption legislation that applies in any jurisdiction in any part of the world in which they might be expected to conduct business.
- Act honestly, responsibly and with integrity.
- Safeguard and uphold **giant's** core values by operating in an ethical, professional and lawful manner at all times.

Bribery of any kind is strictly prohibited.

At **giant**, we recognise that industry practices may vary from country to country or from culture to culture. What is considered unacceptable in one place may be normal or usual practice in another. Nevertheless, a strict adherence to the guidelines set out in this policy is expected of all employees and associated persons at all times.

The giving of business gifts to clients, customers, contractors and suppliers is not prohibited provided that they are reasonable and proportionate and follow the rules set by **giant**, including receiving the advance approval of the recipient's Director or similar.

For the avoidance of doubt, any payment or gift to a public official or other person to secure or accelerate the prompt or proper performance of a routine government procedure or process, otherwise known as a "facilitation payment", is prohibited. Facilitation payments are not commonly paid in the UK, but they are common in some other jurisdictions.

### Responsibilities and reporting procedure



The duty to prevent, detect and report any incident of bribery and any potential risks rests not only with the Directors of **giant** but applies equally to all employees and associated persons, who should be vigilant and report any inappropriate or unlawful conduct, suspicions or concerns promptly.

### **Record-keeping**

At **giant**, we insist that all accounts, receipts, invoices and other documents and records relating to dealings with third parties must be prepared and maintained with accuracy and completeness. No accounts must be kept "off the record" to facilitate or conceal improper payments.

### **Monitoring compliance**

**Giant's** nominated Director has lead responsibility for ensuring compliance with this policy and will review its contents on a regular basis. They will be responsible for monitoring its effectiveness and will provide regular reports in this regard to the Directors of **giant** who have overall responsibility for ensuring this policy complies with **giant's** legal and ethical obligations.

### **Training**

At **giant**, training is provided to all employees to help them understand their duties and responsibilities under this policy.

**Giant's** approach to bribery will also be communicated to all business partners at the outset of the business relationship with them and as appropriate thereafter.

### **HMRC taxed award scheme**

All and any approved incentive, gift or benefit provided by **giant** are registered and declared under our HMRC taxed award scheme.