



## **Anti-Bribery & Corruption Policy**

### **Policy**

AK Design Partnership LLP (AKDP) strives to undertake its business fairly with honesty and transparency. This must be reflected in every aspect of its business affairs.

The action and conduct of AKDP Partners and staff (collectively AKDP Personnel) as well as others acting on AKDP's behalf are essential to maintaining these standards. To that end, all AKDP personnel, including agents, consultants and contractors must read, become familiar and comply with this Anti Bribery Policy.

### **Compliance with Anti-Bribery Laws**

It is AKDP's Policy to comply with all laws, rules and regulations governing anti bribery and corruption law. AKDP has a zero tolerance approach to acts of bribery and corruption, by employees or anyone acting on our behalf. Any breach of this policy will be regarded as a serious matter by the Practice of which is likely to result in disciplinary action.

Under UK law (UK Bribery Act 2010), bribery and corruption is punishable for individuals by up to ten years imprisonment. If the company is found to have taken part in the corruption or lacks adequate procedures to prevent bribery, it could face an unlimited fine and, be excluded from tendering for Government contracts and face untold damage to its reputation.

- The payment or offer to pay bribes, or provisions of, or offer to provide gifts or anything of value for improper purposes, to obtain or retain business or any other benefit, (whether for AKDP or any other party) is prohibited. Such payments or gifts are also forbidden under the terms of this policy and may result in immediate dismissal for those involved in their payment or receipt.
- AKDP is required to keep financial records and to have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

### **Application of the Policy**

This policy applies to individual employees, agents, sponsors, intermediaries, consultants or any other people or bodies associated with AKDP. Bribery is committed when an inducement or reward is provided, in order to gain any commercial, contractual, regulatory or personal advantage for AKDP or another party.

No bribes of any sort may be paid or accepted from customers, suppliers, politicians, government advisors or representative's private person or Company. It is not permitted to establish accounts or internal budgets for the purpose of making facilitation bribes or influencing transactions (slush funds).

AKDP recognise that to refuse a gift in certain circumstances would cause offence to our trading partners. The test to be applied in all circumstances is whether the gift or entertainment is reasonable and justifiable. What is the intention of the gift? Is the gift being offered for something in return (quid pro quo). This policy does not prohibit the following practices providing they are customary in a particular market, or are appropriate and properly recorded. Please refer to our code of conduct and gifts policy for further information.

- Normal and appropriate hospitality (given or received) up to and not exceeding the value of £100 sterling.

### **Employee Responsibility**

The presentation, detection and reporting of bribery is the responsibility of all AKDP employees. Suitable channels of communication by which employees or others can report confidentially any suspicion of bribery, which will be maintained through AKDP's Whistle Blowing policy.

### **Reporting Incidents of Bribery and Corruption**

If you become aware that an activity or conduct which has taken place which you suspect is a bribe (or corrupt), you have a duty to report this. Any such incidents should be reported to your Supervisor/Line Manager.

### **Whistle Blowing – Who to Contact**

For further information please call your immediate Supervisor/Manager.

Signature:



Signed by:

David Lloyd

Date:

06.01.2022