



# ANTI BRIBERY

**‘As a supplier, you commit to prevent the use of, and not condone any corrupt activity, bribery or inducement with the aim of securing an improper or unfair business advantage.’**

**The Bribery Act 2010 created four offences and a variety of consequences for offenders, including fines, imprisonment, director disqualification and disbarring from contracts. These offences are:**

- Offering, promising, or giving a bribe.
- Requesting, agreeing to receive, or accepting a bribe.
- Bribing a foreign public official to obtain or retain business.
- A failure by commercial organisations to prevent bribery by those “associated” with it. This includes employees, associated companies, agents and, in some circumstances, others performing services for the company. The only defence to this offence is if the organisation can demonstrate that it has “adequate procedures” in place to prevent bribery.

In all the above cases, an offence will still have taken place even if the bribery is carried out outside the UK.

- A bribe is a financial or other advantage which induces someone to perform a function improperly, or which rewards someone for improper performance. Improper performance is the breach of an expectation that someone will act in good faith, impartially, or in accordance with a position of trust.

- City Plumbing has a Policy on Corporate Hospitality, Entertaining and Gifts, and associated procedures for gathering, analysing and acting on information about entertaining and gifts. This is one tool that we use to protect ourselves against bribery. Our standard long-term supplier contract documents also include specific contractual obligations to highlight the seriousness of compliance with the law in this field. Before our employees can consider accepting gifts and hospitality offers from our suppliers they need approval, according to the following spend levels. Any amount over £50 will need line manager approval, over £500 will need director approval, over £1,500 will need Group Leadership Team member approval and over £5,000 requires Group CEO or CFO approval.
- In order to protect yourself, you should be familiar with, and adhere to, the anti-bribery laws in all the countries in which your company is incorporated or established, and in which you do business. We also expect you to establish and maintain appropriate anti-bribery policies to prevent bribery or attempted bribery taking place on your behalf.
- We’ll risk-assess your compliance in this area using an online questionnaire. If this highlights any risk of bribery in your supply chain, you’ll need to provide mitigating evidence and a formal site assessment may also be required.

## > Useful Links

- **Bribery Act 2010:** [Link](#)
- **Ministry of Justice Guidance:** [Link](#)