



Intelligent illumination



ANTI BRIBERY AND CORRUPTION POLICY

This policy sets out the responsibilities of Coeval and those who work for us in regards to observing and upholding our zero-tolerance position on bribery and corruption. It exists as a source of information and guidance for those working for Coeval to help them recognise and deal with bribery and corruption issues and understand their responsibilities.

Policy Statement

Coeval is committed to conducting its business in an ethical and honest manner. We are committed to implementing and enforcing systems that ensure bribery is prevented and we have a zero-tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly and with integrity in all of our business dealings and relationships in the UK and internationally.

Coeval will uphold laws relating to anti-bribery and corruption in all jurisdiction in which we operate. We are bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both at home and abroad.

Coeval recognises that bribery and corruption are punishable by up to 10 years of imprisonment and a fine. If Coeval is discovered to have taken part in corrupt activities, we may be subject to an unlimited fine, be excluded from tendering for public contract and face serious damage to our reputation. As such we are committed to preventing bribery and corruption in our business and take our legal responsibilities seriously.

Who the Policy Covers

This policy applies to all Coeval employees, including Directors, regardless of their employment status. The policy also applies to any third parties e.g. sub-contractors, customers, suppliers, business contacts etc. who work or meet with Coeval. Any arrangements Coeval makes with a third party is subject to clear contractual terms, including specific provisions that the third party complies with minimum standards and procedures relating to anti-bribery and corruption.

Definition of Bribery

Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting or soliciting something of value or of an advantage to induce or influence an action or decision.

A bribe refers to any inducement, reward, or object/item of value offered to another individual in order to gain commercial, contractual, regulatory or personal advantage.

Bribery is not limited to the act of offering a bribe. If an individual is offered and accepts a bribe they are breaking the law. Bribery is illegal.

Coeval employees must not engage in any form of bribery, whether directly, passively or through a third party. They must not bribe a foreign public official anywhere in the world. They must not accept bribes in any form. If they are uncertain whether something is a bribe, gift or act of hospitality, they must seek advice from the compliance manager.



What is Acceptable

Gifts and Hospitality – normal and appropriate gestures of hospitality and goodwill, whether given to or received from third parties, so long as the following criteria are met:

- It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or business advantage, or as an explicit or implicit exchange for favours or benefits.
- It is not made with the suggestion that a return favour is expected.
- It is compliant with local law.
- It is given in the name of the company and not that of an individual.
- It does not include cash or a cash equivalent e.g. voucher or gift certificate.
- It is appropriate for the circumstances e.g. small gifts around Christmas, a thank you for helping with a large project upon completion.
- It is of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift.
- It is given/received openly and not in secret.
- It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.
- It is not above a certain excessive value (usually £100) or as pre-determined by the compliance manager.
- It is not an offer to or acceptance from a government official or representative, politician or political party, without the prior approval of the compliance manager.

Where it is inappropriate to decline the offer of a gift, e.g. when meeting with an individual of a religion/culture who may take offence, the gift may be accepted as long as it is declared to the compliance manager, who will assess and record the situation.

Coeval recognises that the practice of giving and receiving business gift varies between countries, regions, cultures and religions, so definitions of what is acceptable may differ for each. As good practice gifts, both given and received, should be disclosed to the compliance manager. The intention behind a gift, given or received, must always be considered. Advice from the compliance manager must be sought in the event of any uncertainty.

Facilitation Payments and Kickbacks

Coeval does not accept and will not make any form of facilitation payments. Coeval recognises that these are a form of bribery which involves expediting or facilitating the performance of a public official for a routine government action, with the intention of securing or speeding up the performance of an action or duty. Coeval does not allow kicks to be made or accepted. It is recognised that these are usually made in exchange for a business favour or advantage.