

Business Ethics Framework: Anti-Bribery and Corruption Policy

Date issued: June 2024
Version: 7
Owner: Chief Financial Officer

This policy forms part of Business Stream’s Business Ethics Framework. For further information on the Framework and the Business Ethics Group, please review the Business Ethics Policy

Why do we need this policy?

Business Stream has created and implemented a framework to ensure it operates ethically, upholds the highest standards of conduct and is aligned to the principles of the Ethical Standards in Public Life etc. (Scotland) Act 2000.

This policy forms part of the Business Ethics Framework and should be read in conjunction with the Business Ethics Policy.

Both bribery and corruption are illegal. Corruption refers to the abuse of entrusted power for private gain and usually involves bribery. The main law in the UK for anti-corruption is the Bribery Act 2010.

Under the Bribery Act 2010 bribing, being bribed, bribing a foreign public official and failing to prevent bribery are all offences. This policy is designed to protect our business by mitigating the risk of bribery and the wider offence of corruption.

Business Stream adopts a zero-tolerance approach to both bribery and corruption.

What does this policy cover?

This policy forms part of Business Stream’s Business Ethics Framework and concerns the business conduct of all Business Stream colleagues, contractors and agency workers concerning bribery and corruption.

We aim to encourage a working environment and culture in which bribery and corruption are not tolerated and where individuals can play an active role in preventing them. It’s necessary to acknowledge that it may not be possible to prevent bribery and corruption entirely but we will ensure there are adequate controls in place, reviewed on an annual basis to reduce the risk lowest possible level.

1. Other Related Policies

This policy should be read in conjunction with:

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- Business Ethics Policy
 - Corporate Governance and Code of Business Conduct and Ethics
 - Disciplinary
 - Gifts and Hospitality
 - Fraud Management and Response
 - Unacceptable Actions
 - Whistleblowing

2. Universal Policy

It is essential that all contractors and agency workers, as well as our directly employed staff, are aware of the content of this policy as they'll be expected to comply with the standards of behaviour at all times. Business Stream employees who interact with our suppliers are expected to communicate our *Anti-Bribery and Corruption Policy* and to be clear on our expectations.

3. What is corruption?

Corruption is defined as "The offering, giving, soliciting or acceptance of an inducement or reward which may influence the action of any person".

The main law in the UK for anti-corruption is the Bribery Act 2010.

4. What is an act of Bribing?

Bribery is defined as the offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action which is illegal, unethical or a breach of trust. In other words, offering money or a gift to someone or receiving money or a gift from someone to influence their conduct or decision-making.

The Bribery Act sets out four main offences:

- 1 "Active" bribery – making or offering bribes
- 2 "Passive" bribery – receiving or requesting bribes
- 3 Bribery of a foreign public official
- 4 Failure of commercial organisations to prevent bribery

You must not make, offer, receive or request bribes and must avoid any activity that might lead to a bribe being made or accepted by us or on our behalf, or that might suggest that a bribe will be made or accepted.

5. What does this mean in practice?

5.1. Appropriate Conduct

At both a business and individual level, we must:

- exercise due diligence when engaging with or entering into business with another party
- risk assess our vulnerability to bribery and corruption in general business activity on an ongoing basis
- communicate our anti-bribery and corruption stance through the business and our supply chain
- use common sense and a proportionate approach to help protect our business

Under no circumstances can a Business Stream employee, contractor, agency worker or anyone representing Business Stream offer or accept a bribe. If you're uncomfortable with any form of gift that you have been offered or the reasons why you've been offered it, then do not accept it and report the offer to our People Director. The acceptance of hospitality offered to someone representing Business Stream is not precluded, but the scale of this should always be considered and before accepting any gifts or hospitality you should consult with your line manager and seek their approval. All gifts and hospitality accepted or declined must be

recorded in the Gifts and Hospitality Register which is maintained by our Compliance team. Please refer to the Gifts and Hospitality Policy.

5.2. Misconduct and appropriate action

If a member of staff, contractor or agency worker believes there to be misconduct as regards bribery, they are asked to refer to the Whistleblowing Policy. Business Stream will then take the appropriate action. Action will also be taken against anyone found to be in breach of this policy.

6. Colleague protection

While this policy sets out the appropriate conduct of Business Stream colleagues, it is also designed to protect them. Colleagues in certain areas of the business are more exposed to the risk of bribery and corruption than others. Call recording may be used as evidence in this situation, or if legal action is appropriate, as per the *Call Recording Policy*.

All colleagues **must** report any suspicious activity or any concerns about business conduct in relation to bribery or corruption.

Within Business Stream concerns can be raised directly with the:

- Chief Executive Officer
- People Director
- Business Ethics Co-ordinator (CFO)

Further details on how to report a concern can be found in the Whistleblowing policy.

All colleagues are required to complete an online training course on anti-bribery and regular refresher courses. This is mandatory in line with company policy.

7. Review

The next review of this policy will be no later than July 2026.