

Anti-fraud, bribery and corruption policy

Silver Lined Horizons is committed to the highest standards of ethical conduct and integrity in its business activities. The Company will not tolerate any form of fraud, bribery and corruption by, or of, its employees, agents or consultants or any person or body acting on its behalf.

This policy applies to all staff. Every member of staff and associated person acting for, or on behalf of, SLH is responsible for maintaining the highest standards of business conduct. Any breach of this policy is likely to constitute a serious disciplinary, contractual and criminal matter for the individual concerned and may cause serious damage to the reputation and standing of the SLH.

SLH complies with applicable legislation, including the Fraud Act 2006, the Bribery Act 2010, and with other regulatory requirements and applicable guidance including Managing Public Money.

SLH will seek to equip its staff with the skills, knowledge and expertise to manage its fraud risk effectively. It will provide training to make staff aware of the risks of fraud, bribery and corruption, and of their responsibilities in preventing, detecting, and reporting it.

What is prohibited?

SLH prohibits staff from offering, promising, giving, soliciting or accepting any bribe.

The bribe might be cash, a gift or other inducement to, or from, any person or organisation, whether a public or government official, official of a state-controlled industry, political party or a private person or company. The bribe might be made to ensure that a person or SLH improperly performs duties or functions (for example, by not acting impartially or in good faith or in accordance with their position of trust) to gain any commercial, contractual or regulatory advantage for the organisation in either obtaining or maintaining the SLH business, or to gain any personal advantage, financial or otherwise, for the individual or anyone connected with the individual.

This prohibition also applies to indirect contributions, payments or gifts made in any manner as an inducement or reward for improper performance.

Records

Staff are required to take particular care to ensure that all the SLH records are accurately maintained in relation to any contracts or business activities, including financial invoices and all payment transactions with clients, suppliers and public officials.

Due diligence should be undertaken by staff prior to entering into any contract, arrangement or relationship with a potential supplier of services, agent, consultant or representative. Staff are required to keep accurate, detailed and up-to-date records of all corporate hospitality, entertainment or gifts accepted or offered.

Any gifts, rewards or entertainment received or offered from clients, public officials, suppliers or other business contacts, should be reported immediately to the Director. In certain circumstances, it may not be appropriate to retain such gifts or be provided with the entertainment and staff may be asked to return the gifts to the sender, or refuse the entertainment, for example, where there could be a real or perceived conflict of interest. As a general rule, small tokens of appreciation, such as flowers or a bottle of wine, may be retained staff.

If a staff member wishes to provide gifts to suppliers, clients or other business contacts, prior written approval from the Director is required, together with details of the intended recipients, reasons for the gift and business objective.

Staff must supply records and receipts, in accordance with SLH expenses policy.

Charitable

The Company considers that charitable giving can form part of its wider commitment and responsibility to the community. The Company supports a number of charities that are selected in accordance with objective criteria.

What practices are permitted

This policy does not prohibit normal and appropriate hospitality and entertainment, or the use of any recognised fast-track process that is publicly available on payment of a fee. Any such practices must be proportionate, reasonable and made in good faith. Clear records must be kept.

Reporting

SLH depends on its staff to ensure that the highest standards of ethical conduct are maintained in all its business dealings. Staff are requested by SLH to remain vigilant in preventing, detecting and reporting fraud, corruption and bribery.

Staff are encouraged to report any concerns that they may have to the Director as soon as possible. Staff who report instances of fraud, corruption or bribery in good faith will be supported by SLH. The Company will ensure that the individual is not subjected to detrimental treatment as a consequence of their report. Any instances of detrimental treatment by a fellow employee because a staff member has made a report, will be treated as a disciplinary offence. An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, no staff member, or associated persons should agree to remain silent. They should report the matter to the Director immediately.

Action by SLH

The Company will fully investigate any instances of alleged or suspected fraud, corruption or bribery. Staff suspected of bribery may be suspended from their duties while the investigation is being carried out. The Company will invoke its disciplinary procedures where any member of staff is suspected of bribery. Proven allegations may result in a finding of gross misconduct and immediate dismissal. The Company may terminate the contracts of any staff who are found to have breached this policy.

The Company may also report any matter to the relevant authorities, including the Director of Public Prosecutions, Serious Fraud Office, Revenue and Customs Prosecutions Office and the Police. The Company will provide all necessary assistance to the relevant authorities in any subsequent prosecution.

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