


00-02-03
Human Resources Management System

Anti-Bribery Policy

Name	Position	Signature	Date
Nerys Stead	Head of HR		March 2018

1. Content

1. Content	2
2. Policy	2
3. Related Policies & Forms	2
4. Updates	2

2. Policy

LOFT is committed to carrying out business functions in an open and transparent way operating with the principles of honesty and integrity in respect of its conduct.

On 1 July 2011, the Bribery Act 2010 came into force, and its provisions apply to all of the business. The Bribery Act creates a number of new bribery and corruption offences and holds businesses and institutions liable for failing to prevent bribery carried out on their behalf, irrespective of whether the bribe takes place in the UK or overseas.

The sanctions for these offences include up to 10 years' imprisonment for the individuals responsible. In addition, if LOFT is found to have been involved in acts of corruption undertaken in its name, the penalties include personal liability for senior managers and an unlimited fine and significant reputational damage for our business.

This policy outlines how LOFT is implementing and enforcing effective systems to counter bribery. The purpose of this policy is to:

- Set out our responsibilities, what the Bribery Act means to all staff and how this will be monitored.
- Provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues should they arise.
- Provide information to customers and suppliers as to how we will deal with bribery and corruption.

To ensure that we always respect our supply chain partners and that we drive best value from our relationships with them, we must continue to do business in a fair and open manner and thereby create a high standard supply chain. Opportunity to work with us should always be based on quality, reliability, commitment and price. These are the values that underpin our company and by which we would expect to be judged ourselves.

In order that we meet this standard, we must act in manner which clearly demonstrates our commitment to this approach and this means we will NOT accept corporate hospitality unless it proportionate and reasonable.

LOFT accepts that there will be situations where an employee may be invited to a corporate event or be given a gift. This Policy is not designed to disallow these practices but to ensure that both LOFT and its' staff are fully compliant with the legislation at all times.

By controlling the level of hospitality within our company, we will promote our image based on our values and not contravene and law such as the Bribery Act 2010.

3. Related Policies & Forms

- 00-00-17 Corporate Responsibility
- 00-02-21 Corporate Gifts & Hospitality

4. Updates

Revision	Date	Updated By	Changes
1	March 2018	Nerys Stead	Creation of document
2			