



ANTI-BRIBERY AND CORRUPTION POLICY

Dated April 2020

SEVENTY-NINTH™ GROUP

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1. Overview

1.1. Policy statement

It is our policy to conduct all our business in an honest and ethical manner. We do not tolerate bribery and corruption (directly or indirectly through third parties we work with) and we are committed to acting professionally, fairly and with integrity in all our business dealings and relationships. We are committed to applying and implementing systems and procedures to ensure bribery and corruption are prevented.

We will continuously uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which we operate. The 79th GRP Limited "79TH GRP" is bound by the laws of the UK including the Bribery Act 2010, in regard to our operations both onshore and offshore.

We recognise that bribery and corruption are punishable by up to ten years of imprisonment and unlimited fines. If our company is discovered to have taken part in fraudulent activities involving bribery and corruption, we may be subjected to an unlimited fine, be excluded from tendering for public contracts, and face serious damage to our reputation. It is with this in mind that we commit to preventing bribery and corruption in our business and take our legal responsibilities seriously.

1.2. Scope of this policy

This anti-bribery policy applies to all employees, consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, agents, sponsors or any other persons associated with us (including third parties), or any of our subsidiaries and/or their employees regardless of the geographical location.

In the context of this policy, third party refers to any individual or organisation our company meets and works with. This means actual and potential clients, customers, suppliers and distributors, agents, advisers, business contacts and government and public bodies.

Any arrangements our company makes with any third party is subject to clear contractual terms, including specific provision that require the third party to comply with minimum standards and procedures relating to anti-bribery and corruption.

2. Definitions and explanations

2.1. What is Bribery and Corruption

Bribery – means giving or receiving an unearned reward to influence someone's behaviour. A "kickback" is one of the most common forms of the bribery, it can be described as an unearned reward following favourable treatment.

Corruption – is any unlawful or improper behaviour that seeks to gain an advantage through illegitimate means. Bribery, extortion, abuse of power, fraud, deception, collusion and money laundering are all forms of corruption.

2.2. The Bribery Act 2010

The Bribery Act 2010 recognises four key offences:

- bribery of another person (section 1)
- accepting a bribe (section 2)
- bribing a foreign official (section 6)
- failing to prevent bribery (section 7)

A bribe does not have to involve the exchange of cash and bribery does not just affect bribes to or from public officials, but also includes bribes between private persons or businesses. Bribery may involve facilitation payments or “kickbacks”. “79TH GRP” does not make and will not accept these types of payments.

Facilitation payments (also known as “speed” or “grease” payments) are typically small unofficial payments made to secure or expedite a routine action. These are often, but not always, associated with public officials and particularly foreign public officials.

2.3. Penalties

Bribery is deemed to be a criminal offence as well as a corporate offence. Any individual found guilty of a bribery offence may face imprisonment for up to 10 years and/or an unlimited fine.

A corporate offence is a strict liability offence which also carries an unlimited fine. This means that the intention of improper conduct does not need to be proven.

3. Gifts and hospitality

“79TH GRP” acknowledges that occasionally, as business requirements demand, it may give (entirely at its own discretion) and/or receive, proportionate gifts, hospitality and entertaining for the purposes of establishing or maintaining good business relationships or improving our reputation/image, so long as the giving or receiving meets the following requirements:

- a. It is not made with the intention of influencing the party to whom it is being given, to acquire or reward the retention of business or a business advantage, or as an explicit or implicit exchange for favours or gains.
- b. It is in compliance with the law of a given jurisdiction.
- c. It is of appropriate type and value and given at a suitable time, taking into account the rationale behind the gift.
- d. It is appropriate for the circumstances.
- e. It is given in the company’s name as opposed to the individual.
- f. It does not include cash or a cash equivalent.
- g. It is not made with the suggestion that a gift in return is expected.
- h. It is made openly, not in secret.

It is appreciated that the practice of giving and receiving business gifts differs between different regions and what may be appropriate in one region, may not necessarily be in another. The litmus test to be applied is whether the gift or hospitality is reasonable and justifiable.

It is not acceptable for an employee (or someone on their behalf) to:

- a. Give or promise to give, or offer, a payment, gift or hospitality with the expectation that they or "79TH GRP" will be given an unfair business advantage, or as a reward for a previously inappropriately given business advantage.
- b. Give, promise to give, or offer, a gift, payment or hospitality to a government official, agent or other representative to facilitate or expedite a standard procedure.
- c. Accept payment/gift/hospitality from a third party if there is a suspicion or knowledge that it is offered with the expectation of obtaining an unfair business advantage.
- d. Threaten or retaliate against any members of staff who refuse to commit bribery offences, or who have raised concerns under this anti-bribery and corruption policy.
- e. Engage in any activity which may lead to a breach of any points raised in this policy.

A full written record must be maintained by the company of all hospitality and/or gifts made or received of value over £50 in any accounting period.

4. Facilitation payments and 'kickbacks'

We do not accept or make any kind of facilitation payment, also known as 'kickbacks', such as any unofficial payments made to secure or expedite a routine action by a government official or payments made in return for a business advantage.

We recognise that these types of payments are paid to low level officials with intention of securing or advancing the performance of a certain duty or action.

We acknowledge that, notwithstanding our strict policy on facilitation payments, our employees may face a situation where refusing such payments or 'kickbacks' may affect their personal security. In order to ensure that personal security is not compromised, employees may accept such payments but must undertake the following actions:

- a. Keep any amount to the minimum.
- b. Ask for a receipt, detailing the amount and reason for a payment.
- c. Create a written record concerning the payment.
- d. Report the incident to Finance Director / Managing Director as soon as possible.
- e. Line management must record all such events and make a report to the Board/relevant officer of the Company.

5. Political contributions

We will not make any politically related contributions, whether in cash or any other means, to support parties or individual candidates. We accept that this could be understood as an attempt to secure an unseemly business advantage.

6. Charitable contributions

We accept and encourage the act of donating to UK registered charities, regardless of the type of donation, from services, knowledge, time or direct financial contributions; we agree to fully disclose any and all charitable contributions that we make.

7. Employee responsibilities

- a. All employees of "79TH GRP" must ensure that they fully understand and comply with the information included in this policy, furthermore it is the employee's responsibility to understand and comply with any further training or any other anti-bribery and corruption information that is provided.
- b. All employees and those under our control are equally responsible for the prevention, detection and reporting of bribery and other forms of corruption. Employees are required to avoid any activities which could imply or lead to a breach of this anti-bribery policy.
- c. If an employee has any reason to believe that an act of bribery or corruption has occurred or will occur in the future, it is their duty to bring this to the attention of the manager.
- d. Any employee found to be in breach of this policy will face disciplinary action and could face dismissal for gross misconduct. "79TH GRP" have the right to terminate any contractual relationship with an employee if they are deemed to be in breach of this anti-bribery policy.

8. Raising concerns/whistleblowing

Employees are urged to raise concerns about any issue or suspicion of misconduct at the earliest possible stage with the Director of Finance. If employees are unsure whether a particular act constitutes bribery or corruption, or if they have any other queries, these should be raised with the Directors; David Webster, Jake Webster or Curtis Webster.

"79TH GRP" will familiarise all employees with its whistleblowing procedures in order to ensure the process of dealing with the employees' concerns promptly and in confidence.

9. What to do if an employee is a victim of bribery

If an employee has been offered a bribe or has been asked to make one or suspect that they may be bribed or asked to make a bribe in a near future, it is vital that the Directors David Webster, Jake Webster or Curtis Webster is informed at the earliest opportunity.

10. Protection

Employees who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

We are committed to ensuring no one undergoes any detrimental treatment as a result of refusing to take part in bribery or corruption entailed activities, or because of their integral attitude in reporting in good faith a suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If employees believe that they have suffered any such treatment, David Webster, Jake Webster or Curtis Webster should be informed.

11. Training and communication

Anti-bribery training will be provided to relevant members of staff with a higher risk of exposure to bribery and corruption matters.

Our zero-tolerance attitude towards bribery and corruption will always be distinctly communicated to partners and all parties involved with any business dealings at the outset of any business relationships, and as appropriate thereafter.

12. Record keeping

In order to ensure that there is full compliance with the Bribery Act 2010, we will maintain comprehensive and accurate financial records and put in place the necessary internal controls to prove the destination of all payments made by the company.

We will keep records of all actions and amounts in respect of hospitality or gifts received and given over the value of £50 in any accounting period.

13. Monitoring and reviewing

"79TH GRP" will closely monitor the effectiveness of this policy and conduct annual reviews aiming to introduce any potential improvements identified with any subsequent training provided where necessary. In-house control systems and processes will be subject to regular appraisals to provide assurances indicating the effectiveness in counteracting bribery and corruption.

This policy does not form part of any current or future employee contract of employment, and we may amend it at any time to enhance its effectiveness at tackling bribery and corruption.



ESTABLISH MORE, **TOGETHER.**

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Please do contact us should you require any further clarification.