



Origin Voice & Data Limited

Anti-Bribery and other Corrupt Behaviour Policy

Origin has a strict anti-bribery and corruption policy in line with the Bribery Act (2010). A bribe is defined as: giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for having already done so.

If you, as an Origin employee bribe (or attempt to bribe) another person, intending either to obtain or retain business for Origin, or to obtain or retain an advantage in the conduct of the company's business this will be considered gross misconduct. Similarly accepting or allowing another person to accept a bribe will be considered gross misconduct. In these circumstances you will be subject to formal investigation under the Company's standard disciplinary procedures and disciplinary action up to and including dismissal may be applied.

Your working relationships may bring you into contact with outside organisations where it is normal business practice or social convention to offer hospitality, and sometimes gifts. Offers of this kind to you or your family can place you in a difficult position. Therefore, no employee or any member of his or her immediate family should accept from a supplier, customer or other person doing business with Surecam, payments of money under any circumstances, or special considerations, such as discounts or gifts of materials, equipment, services, facilities or anything else of value unless:

- ❖ They are in each instance of a very minor nature usually associated with accepted business practice.
- ❖ They do not improperly interfere with your independence of judgement or action in the performance of your employment.

“...In every circumstance where a gift is offered, the advice of your line manager must be sought ...”