



ANTI-BRIBERY AND CORRUPTION POLICY

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2. INTRODUCTION TO THE POLICY

ICEFLO Limited is firmly committed to ensuring there is no bribery or corruption in any part of the organisation. ICEFLO Limited has a duty under the Anti Bribery Act 2010 to ensure that all its actions and those of its employees, suppliers, and third parties are impartial, fair, and legal.

Employees should also refer to FSA policies, procedures and rules and ICEFLO Limited associated financial policies.

3. ANTI BRIBERY ACT 2010

Under the Anti Bribery Act 2010 it is unlawful to offer or solicit a bribe, gift, or other incentive in return for favourable treatment.

A bribe is defined as:

“a financial payment or other form of reward or advantage, whether direct or indirect that is intended to persuade or influence or have the effect of persuading or influencing an individual, company or public body to perform their functions, including business and public duties, improperly”.

For the avoidance of doubt, improper performance includes:

- Not acting in good faith;
- Not acting impartially; and
- Not acting in accordance with a position of trust.

4. GIFTS AND HOSPITALITY

To ensure fairness and to support the enforcement of the Anti-Bribery and Corruption policy, an Employee, associate, or contractor must declare all gifts, tips or hospitality offered to them either as an individual or the team as whole immediately.

A. WHAT WILL BE CONSIDERED A GIFT OR HOSPITALITY?

Gifts, tips, and hospitality may include, but not be limited to:

- Cash tips
- Gift vouchers
- Thank you, gifts, such as food or wine
- Tickets to events
- Free meals or drinks
- Discounts on the donating organisations goods or services.

B. WHAT SHOULD AN EMPLOYEE DO IF OFFERED A GIFT OR HOSPITALITY

In general, any gifts or hospitality offered by existing or potential customers, suppliers or third parties should be politely discouraged where possible. If they are given you should thank the customer, supplier or third party and inform them that the gift or hospitality will be considered in line with the ICEFLO Limited policy on gifts and corporate hospitality.

C. GIFTS AND HOSPITALITY REGISTER

ICEFLO Limited will maintain a Gifts and Hospitality register for all gifts, tips and hospitality offered to the organisation or an individual employee, associate, or volunteer with a value of £50 or more. It will be for the CEO to confirm whether they gift may be accepted or not.

D. HOW MAY GIFTS AND HOSPITALITY THAT ARE ACCEPTED BE MANAGED?

If accepted, it will be for the CEO to decide whether the individual initially receiving the gift or hospitality may keep the gift or whether it will be managed in an alternative way such as (this list is not exhaustive):

- Being offered to all employees, associates, and volunteers in return for a charitable donation
- Being offered to all employees, associates and volunteers via a raffle or draw
- Being offered to an employee, associate, or volunteer in recognition of an exceptional contribution

Any failure to declare a gift, tip or hospitality may result in disciplinary action.

5. EMPLOYEE RESPONSIBILITIES

The Employee agrees that they will not offer, promise, give, request, or agree to receive, or accept any bribes:

- In the course of their employment
- When conducting business on behalf of ICEFLO Limited
- When representing ICEFLO Limited in any capacity.

The Employee agrees to comply with the ICEFLO Limited anti-bribery policy and procedures and agrees to comply with all applicable bribery and corruption laws in all countries in which they operate.

The Employee agrees to report any suspicious conduct that may amount to a bribe being offered, promised, given, requested or accepted involving you, another employee or a person

acting for or on behalf of ICEFLO Limited, immediately to your Line Manager in accordance with the anti-bribery policy and guidelines.

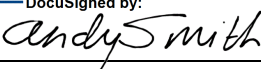
The Employee agrees to comply with the Gifts and Hospitality rules as set out in Clause 3.

6. CONSEQUENCES OF FAILING TO COMPLY

ICEFLO Limited may terminate the Employees employment for gross misconduct without notice or pay in lieu of notice without prejudice to any rights or claims it may have against them if it is found by them or any other relevant public or legal authority, that they are guilty of bribery.

ICEFLO Limited may also report the individual to the relevant or legal authority.

7. DOCUMENT CONTROL

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