ANTI-BRIBERY & CORRUPTION POLICY

Date of policy: 01/09/2026
This policy will be reviewed every 12 months (as a minimum)
Review Date: 01/09/2027

INTRODUCTION

It is Parker Smith Inclusion's policy to conduct its business in an honest and ethical manner. Parker Smith Inclusion takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships wherever Parker Smith Inclusion operates.

Parker Smith Inclusion will uphold all laws relevant to countering bribery and corruption including the Bribery Act 2010 ('the Act'), in respect of its conduct both at home and abroad.

THE PURPOSE

The purpose of this policy is:

- To set out the responsibilities of Parker Smith Inclusion, and of those working for it, in observing and upholding our position on bribery and corruption; and
- To provide information and guidance to those working for Parker Smith Inclusion on how to recognise and deal with bribery and corruption issues.

Bribery and corruption are punishable for individuals by up to ten years' imprisonment and if Parker Smith Inclusion is found to have taken part in corruption it could face an unlimited fine, be excluded from tendering for public contracts and face damage to its reputation. Parker Smith Inclusion therefore takes its legal responsibilities very seriously.

In this policy, third party means any individual or organisation you come into contact with during the course of your work for Parker Smith Inclusion, and includes temporary workers, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies.

References in this policy to obtaining written approval includes obtaining approval by e-mail.

WHO IS COVERED BY THE POLICY?

This policy applies to all individuals working at all levels and grades, and includes all employees (whether permanent, fixed-term or temporary), contractors, trainees, casual workers and agency staff, volunteers or any other person associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as workers in this policy), The Act applies to conduct both within and outside the UK.

WHAT IS BRIBERY?

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. At the end of this document there is a schedule setting out some scenarios that illustrate potential bribery.

GIFTS AND HOSPITALITY

In addition to the requirements set out below, you must register any gifts or hospitality given or received with an estimated value in excess of £10 with either your Line Manager or responsible person. The details of how to do this are set out below. Further, you must obtain the written approval (which includes by e-mail) of your line manager in relation to any gifts or hospitality given or received with an estimated monetary value in excess of £10.

Parker Smith Inclusion recognises that the practice of the giving and receiving of business gifts or hospitality varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift or hospitality should always be considered.

HOSPITALITY

This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties, for the purposes of establishing or maintaining good business relationships or improving or maintaining our reputation or image.

GIFTS

The giving or receipt of gifts is not prohibited, if the following requirements are met:

- it is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
- it is given in Parker Smith Inclusion's name, not in your name;
- it does not include cash or a cash equivalent (such as gift certificates or vouchers);
- it is appropriate in the circumstances. For example, in the UK it is customary for small gifts to be given at Christmas time;
- taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time; and it is given openly, not secretly.

WHAT IS NOT ACCEPTABLE?

It is not acceptable for you (or someone on your behalf) to:

- give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that either a personal or business advantage will be received, or to reward either a personal or business advantage already given;
- Accepting third party financial incentives or gifts outside of agreed policies
- give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure;
- accept payment from a third party that you know, or suspect is offered with the expectation that it will obtain either a personal or business advantage for them;
- accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that either a personal or business advantage will be provided by Parker Smith Inclusion in return;
- turn a blind eye to any of the above;
- threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or engage in any activity that might lead to a breach of this policy.

THIRD PARTY DUE DILIGENCE

Before engaging with any third parties, such as suppliers, distributors, agents, or business partners, employees must ensure that due diligence procedures are followed. This includes conducting background checks to assess the integrity and reputation of these parties, particularly in relation to bribery and corruption. We run credit checks on potential clients and suppliers, as well as checking reviews on legitimate sites such as Trust Pilot.

A comprehensive due diligence checklist will be provided to employees to guide them through the process. Any red flags or concerns identified during due diligence must be reported to the Compliance and HR Manager for further investigation.

DONATIONS

We do not make any contributions to political parties.

YOUR RESPONSIBILITIES

You must ensure that you read, understand and comply with this policy. The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for Parker Smith Inclusion or under its control. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.
Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with other workers if they breach this policy.

TRAINING

Parker Smith Inclusion is committed to providing regular training and awareness programs on anti-bribery and corruption practices. Employees at all levels, including management, are required to undergo training sessions to familiarise themselves with the provisions of this policy and understand their responsibilities. Employees will receive guidance on how to recognise potential bribery and corruption risks, as well as the appropriate procedures for reporting any concerns. Training sessions will be conducted every 4 years, with additional sessions for new employees as part of their induction process.

RISK ASSESSMENT

As part of Parker Smith Inclusion commitment to combat bribery and corruption, Parker Smith Inclusion conducts periodic risk assessments. These assessments are designed to identify and evaluate any potential vulnerabilities to bribery within our operations. The findings of these assessments will be used to implement targeted measures to mitigate these risks effectively. Keya Mckenzie, the Compliance and HR Manager, is responsible for completing the risk assessments and sharing this information with the board. PS Inclusion already run Enhanced DBS checks, prior to employment to determine any risk exposed to the business.

REPORTING MECHANISMS

Employees are encouraged to report any suspected instances of bribery or corruption promptly. Parker Smith Inclusion has established a confidential reporting channel to facilitate the reporting of such concerns. Reports can be made anonymously, and individuals can be assured that they will be protected against any form of retaliation.
Employees should report suspected incidents to the Darragh Ryan or use the confidential reporting hotline/email: darragh@psinclusion.co.uk. Reports will be promptly investigated, and appropriate actions will be taken in accordance with this policy and relevant laws.

INVESTIGATIVE PROCEDURES

Upon receiving a report of suspected bribery or corruption, Parker Smith Inclusion will initiate a thorough investigation. The investigation process will be conducted impartially and confidentially, involving relevant departments, legal advisors, or external auditors as necessary.
The Compliance and HR Manager will oversee the investigation and ensure that all facts are gathered objectively. Employees are expected to cooperate fully with any investigation and maintain confidentiality throughout the process.

MONITORING AND REVIEW

To ensure the effectiveness of this policy, Parker Smith Inclusion will conduct regular reviews and audits. These reviews will assess compliance with the policy, identify any emerging risks, and make necessary updates to the policy as required. Employees are encouraged to provide feedback on the policy and suggest improvements. The policy will be reviewed annually by the Compliance and HR Team to ensure it remains relevant and effective in combating bribery and corruption.

CONSEQUENCES OF ENFORCEMENT

Any employee found to have violated this policy will be subject to disciplinary action, up to and including termination of employment. Disciplinary measures will be proportionate to the severity of the offense and may include warnings, fines, demotions, or dismissal for gross misconduct.
Parker Smith Inclusion reserves the right to terminate its relationships with third parties, such as suppliers, agents, or business partners, if they are found to have engaged in bribery or corrupt activities.

RECOVERY OF BENEFITS

If a staff member has accepted third party incentives or gifts, Parker Smith Inclusion may require the individual to return or reimburse the value of such benefits.

POLICY REINFORCEMENT

Parker Smith Inclusion will reinforce this policy, as well as our policies and processes through regular training sessions, reminders and ongoing communications. This is especially important upon notification of any breaches of this policy by a member of staff. This ensures that members of staff are kept up to date with current processes and compliance expectations, as well as consequence of non-compliance.

RECORD KEEPING

Parker Smith Inclusion must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

If you are required to register a gift or hospitality under this policy, you must complete the Gifts and Hospitality Registration form and send it your Line Manager who will maintain a Register of Gifts and Hospitality (which can consist of storing the forms electronically). You must register any gift or hospitality within 28 days. Requests to your line manager for written approval (which includes by e-mail) of gifts or hospitality must be submitted in advance where possible to allow time for a decision to be made.

You must ensure that all claims relating to hospitality and gifts and other payments to third parties are submitted in accordance with the relevant policy and specifically record the reason for the expenditure.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers, and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

WHO IS RESPONSIBLE FOR THE POLICY?

Parker Smith Inclusion has overall responsibility for ensuring that this policy complies with our legal and ethical obligations, and that all those under Parker Smith Inclusion's control comply with it.

ACKNOWLEDGMENT OF RECEIPT

All employees are required to sign an acknowledgment form indicating that they have received, read, understood, and agreed to comply with this Anti-Bribery Policy. By signing the acknowledgment, employees affirm their commitment to upholding the highest standards of integrity and ethical conduct in all business dealings.

This Anti-Bribery Policy and its associated procedures apply to all employees, contractors, consultants, temporary workers, agency staff, volunteers, and any other persons associated with Parker Smith Inclusion.

Disclaimer:

This Anti-Bribery Policy is not exhaustive, and employees are encouraged to seek guidance from the Compliance and HR Manager or the Directors if they have any questions or encounter situations not addressed in this policy.

Parker Smith Inclusion reserves the right to amend, update, or modify this policy at any time to ensure its effectiveness and compliance with applicable laws and regulations.

By implementing and adhering to this Anti-Bribery Policy, Parker Smith Inclusion aims to foster a culture of transparency, integrity, and ethical behaviour across all levels of the organisation. Together, we can uphold our commitment to conducting business in an honest and ethical manner, free from bribery and corruption.

This policy shall be effective from 22/07/2025.

REVIEW DATES	
Author	Keya Mckenzie
Version	1
Director Sign Off	Darragh Ryan
Date	22/07/2025