



SOUTH COAST  
PORT SERVICES

## **POLICES & PROCEDURES ANTI BRIBERY AND CORRUPTION**

### **1. Policy Statement.**

1.1 For the purpose of this policy Bribery is defined as promising, offering, giving, requesting or receiving something of value for the purposes of influencing a person in charge of his or her duties. Corruption is defined as giving or obtaining advantage through means which are illegitimate, immoral or inconsistent with one's duty or the rights of others including through the use of bribery.

1.2 South Coast Port Services is committed to the prevention, detection and response to bribery and corruption.

1.3 The purpose of this policy is to set out the responsibilities in observing and upholding the company position on bribery and corruption.

1.4 The violation of this policy is a serious matter and may constitute grounds for summary dismissal (gross misconduct), and potential fines or Prison sentence if investigated and convicted external of the company policy and procedures.

### **2. Overview.**

2.1 This policy applies to all Employees both permanent and non-permanent working for South Coast Port Services at all levels. We are also committed to ensuring transparency in our approach to tackling bribery and corruption throughout our supply chains as shown on our website.

2.2 It is our policy to conduct all of our business in an honest and ethical manner. We take a zero tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate implementing and enforcing effective systems to counter bribery and corruption.

### **3. Policy.**

3.1 Employees both permanent and non-permanent working for South Coast Port Services are required to read, understand and comply with this policy and procedure.

3.2 The Company expects all permanent and non-permanent employees and all others associated with the business to support and uphold all anti-bribery and corruption measures as set out by South Coast Port Services.

3.3 The company also expect all permanent and non-permanent employees to uphold all anti-bribery and corruption measures as set out by our customers whilst working under their instruction.

3.4 The Company expects everyone working for or associated with the business to support and uphold the policy by Detection, Prevention and Reporting to safeguard against bribery and corruption.

3.5 Any concerns of malpractice must be reported at the earliest possible stage by reporting to the Divisional Operations Manager / Company Directors.

3.6 The company take a risk based approach to our contracting processes and keep them under review. We require suppliers to comply with our code of conduct which sets out the minimum standards required to combat bribery and corruption. Additionally the same approach is taken with recruitment agencies and other third parties supplying workers to our Company to confirm their compliance with our code of conduct.

3.7 As part of our on-going risk assessment and due diligence process we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our code of conduct.

3.8 If the Company find that other individuals or organisations working on our behalf have breached this policy we will ensure that we take appropriate action. This may range from considering the possibility of a breach being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships.

#### **4. Responsibilities.**

4.1 The Company Directors have overall responsibility for ensuring this policy complies with its legal and ethical obligations in accordance to the Law. *Refer to (UK Bribery Act 2010).*

4.2 Management at all levels are responsible for implementing this policy, the monitoring, communication and refresher training to all those who report to them.

4.2 Employees both permanent and non-permanent or working on behalf of South Coast Port Services, or associated with the business are responsible for supporting and upholding the policy by Detection, Prevention and Reporting to safeguard against bribery and corruption.

4.3 In the event you believe or suspect a breach of this policy either has happened or may in the future it must be reported to your line manager at the earliest opportunity.

4.4 Employees both permanent and non-permanent must not engage in, facilitate or fail to report any activity that might lead to, or suggest a breach of this policy.

## **5. Hospitality and Gifting.**

5.1 The company recognise that there are legitimate reasons to provide / receive hospitality, gifting that is reasonable and proportionate. Divisional /Operations Managers or Managing Directors should be informed of any such exchange of hospitality and gifting and authorisation needs to be given.

5.2 The company do not accept gifts or hospitality from anyone associated with the business if we know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return.

5.3 The company do not offer gifts or hospitality to anyone associated with the business for the purpose of gaining an advantage in return.

## **6. Donations.**

6.1 Generally the Company do not make payments or donations to charitable organisations or sponsorship requests. All such requests received must be passed to the Company Directors in the first instance.

## **7. Summary.**

7.1 You should always consider whether what is being asked of, or offered to you is legitimate, proportionate and appropriate.

7.2 The Company reserves the right to change any of the provisions set out in this document from time to time, as may be required. The policy will be applied in its latest published form.