

Eazi-Business Anti-Bribery and Corruption Policy

About This Policy

It is our policy to conduct 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 our business dealings and relationships.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. Any non-employee who breaches this policy may have their contract terminated. In addition, you may face consequences for illegal action since bribery is illegal in many countries.

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Who We Are

“We” “our” or “us” refers to the licensor company, Eazi-Business Limited. We are a limited company registered in England and Wales with registered number 08364226 and registered office at The Old School House, 65A London Rd, Oadby, Leicester LE2 5DN, UK (also using various trading names such as Eazi-Apps, Eazi-Sites, Eazi-SEO). This licensor company and all licensees in the network have no responsibility or liability for other licensees, who are all separate legal entities, nor for their personnel.

Who Must Comply with This Policy

This policy applies to everyone when working for us, with us or on our behalf in any capacity, including employees at all levels, directors, officers, owners, licensees, agency or seconded workers, interns, agents, contractors, consultants, service providers, third-party representatives and business partners.

Our licensees must also ensure compliance within their own business and personnel with this policy or their own policy. Their own policy must include obligations and prohibitions at least at the level of those in this Policy but must be adapted for their local legislation to comply with any additional or further requirements under that legislation.

What is bribery?

Bribe means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, award of a contract or any other advantage or benefit. Bribery includes offering, promising, giving, accepting or seeking a bribe. If unsure whether something is bribery, raise it with your manager.

All forms of bribery are strictly prohibited. As examples, you must not (directly or indirectly on a personal or business level) do any of the following:

- give or offer any payment, gift, hospitality or other benefit in the expectation that a business advantage will be received in return, or to reward any business received;

- accept any offer from anyone if you know or suspect that the offer is made with the expectation that we or you will provide a business advantage for them or anyone else;
- give or offer any payment (sometimes called a facilitation payment) to a government official or authority in any country to facilitate or speed up a routine or necessary procedure;

You must not threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.

Gifts and hospitality

This policy does not prohibit the giving or accepting of reasonable and appropriate hospitality for legitimate purposes such as building relationships, maintaining our reputation, or marketing. A gift or hospitality is not appropriate if it is unduly lavish or extravagant or could be an inducement or reward for preferential treatment (for example, during contractual negotiations or a tender process).

Gifts must be of an appropriate type and value depending on the circumstances and reason. Gifts must not include cash or cash equivalent (such as vouchers) nor be given in secret. If in doubt, avoid gifts.

Promotional gifts of low value such as branded stationery may be given to or accepted from existing clients, suppliers and business partners.

Record-keeping

You must declare and keep a written record of all hospitality or gifts given or received and the reason. All accounts, invoices, and other records including those relating to suppliers and clients must be prepared with strict accuracy and completeness. Secret or additional accounts or records must not be kept to facilitate or conceal improper payments.

How to raise a concern

If you are offered a bribe, or are asked to make one, or if you suspect that any bribery, corruption or other breach of this policy has occurred or may occur, you must notify your manager or report it in accordance with any Whistleblowing Policy as soon as possible.

Changes to This Policy

We keep this Policy under review. The date that it was last updated is set out below. As a result of our reviews, we reserve the right to make changes to this Policy. The current version of this Policy is the one published at the relevant time on our internal website for us, our personnel or licensees.

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Version Date: 23.01.21